

**MODIFIED
SIGNATURE
PAGE**

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

MODIFIED PERMIT

MODIFICATION AUTHORIZATION

PERMITTEE: SYNGENTA CROP PROTECTION, INC

PERMIT NUMBER: LAD053783445-OP-RN-1-MO-1

AGENCY INTEREST: AI 2367

PERMIT ACTIVITY NO.: PER 20070027

FACILITY: IBERVILLE PARISH

LOCATION: 3905 HIGHWAY 75
St. Gabriel, LOUISIANA 70776

This modification applies to the permit LAD053783445-OP-RN-1 issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder to Syngenta Crop Protection, LLC, (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage, and Disposal facility (TSD) Louisiana, at latitude 30° 15' 011" and longitude 91° 06' 033" and which became effective March 14, 2005.

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The Permittee must comply with all terms and conditions of this permit as modified according to the procedures and under the authority of the Louisiana Administrative Code (LAC) 33:V, Chapter 3. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation,

and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This modified permit shall be effective as of July 4, 2009, and shall remain in effect until March 15, 2015, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within thirty (30) days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

LA. Department of Environmental Quality
Office of the Secretary
Attention: Hearing Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302



Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

20 May 2009

Date

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
SYNGENTA CROP PROTECTION, INC.
FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
ACTION

The LDEQ, Office of Environmental Services, has made the decision to issue the final modified hazardous waste operating permit for Syngenta Crop Protection, Inc., Post Office Box 11, St. Gabriel, Louisiana, 70776, for the St. Gabriel Facility. **The facility is located at 3905 Highway 75, St. Gabriel, Iberville Parish.**

Under this final modified hazardous waste permit, final language will include modified permit conditions which were included in Syngenta's draft modified permit issued on August 12, 2008. Final language revised include the following issues:

- Condition III, Table 1, Condition IV.B, Table 3, Condition IV.C.1 and Condition V.B, Table 8 have been revised to make the Tank Unloading Area into a Tank Loading and Unloading Area. Syngenta ceased operation of the Rotary Kiln and plans to send the waste that was to be incinerated for outside disposal. In order to send the waste for outside disposal, the Tank Unloading Area has to be converted to a Tank Loading and Unloading Area.

- Condition VII (Current HSWA Language) will be replaced with Conditions VII and VIII (new Corrective Action Strategy (CAS) Language).

- Condition VIII Tables 2 and 3 will be revised with updated/current information on Syngenta's SWMUs and AOC's to be submitted as a permit modification request at a future date.

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy of this action may be reviewed at Iberville Parish Library-East Iberville Branch, 5715 Monticello St., St. Gabriel, Louisiana; Iberville Parish Library, 24605 J. Gerald Berret Blvd., Plaquemine, Louisiana and the Ascension Parish Library, 708 South Irma Blvd., Gonzales, Louisiana.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit

action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of the action has been given.

Previous notices have been published in the The Advocate and The Plaquemine Post-South on Thursday, August 21, 2008.

Inquiries or requests for additional information regarding this permit action, should be directed to Keith R. Williams, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3011.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the issued permit and associated information can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 2367, Permit Number LAD053783445-OP-RN-1-MO-1, and Activity Number PER20070027.

Scheduled Publication Date: June 4, 2009

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

JUN 03 2009

Mr. W. Ralph Caddell
Syngenta Crop Protection, Inc.
P.O. Box 11
St. Gabriel, LA 70776

RE: Syngenta Crop Protection, Inc.
LAD 053 783 445-RN-OP-1-MO-1
Agency Interest No. 2367/PER20070027
Final Modified Hazardous Waste Operating Permit

Dear Mr. Caddell:

Attached, is your copy of the Syngenta Crop Protection, Inc., final modified hazardous waste operating permit, LAD 053 783 445-RN-OP-1-MO-1, which incorporates language pertaining to the operation and management of a hazardous waste container storage area and corrective action activities at the Syngenta Crop Protection, Inc., St. Gabriel Site.

In accordance with LAC 33:V.705.B.3, the final modified permit received no comments requesting a change in permit language. Therefore, the final modified permit shall become effective immediately upon issuance. However, in accordance with Louisiana Revised Statute La. R.S. 30:2024, the Permittee may file with the Secretary a request for hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial Court within thirty (30) days after the notice of the action has been given.


Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit (including authorization under general permits; variances and other authorizations) during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Mr. Caddell
AI#2367, PER20070027
Page 2

Please reference Agency Interest Number (2367), Permit Activity Number PER20070027, and LAD053783445-RN-OP-1-MO-1 on all future correspondence. Should you have any questions concerning this matter, please contact Ms. Soumaya Ghosn, Public Participation Group, at (225) 219-3276 or Mr. Keith R. Williams, Waste Services Section, at (225) 219-3011.

Sincerely,



 Thomas F. Harris
Administrator
Waste Permits Division

krw

Attachment

VERIFICATION BY FACILITY

The undersigned verifies that the Syngenta Crop Protection, Inc., St. Gabriel Facility has received a copy of the final hazardous waste operating permit and public notice regarding:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Via Fax (225) 388-0164, Phone (225) 388-0128

Ms. Susan Bush
Legal Advertising
The Advocate
Post Office Box 588
Baton Rouge, LA 70821-0588

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the Advocate once only on Thursday, June 4, 2009. The legal notice itself will also be sent via email, as an attachment, to legal.ads@theadvocate.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification was made in the time specified, we are requesting that you sign and date the enclosed Verification by Newspaper and fax to the attention of Ms. Laura Ambeau (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277 or email laura.ambeau@la.gov.

Charges for this service should be billed to:

Mr. Richard B. Boudreau
Sr. Staff Engineer, Environmental
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA 70776
225-642-1257

The original proof of publication should be mailed to the attention of Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments/2

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the _____ (date of publication) edition of the Advocate:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

The Advocate

By: _____ Date: _____

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau at (225) 325-8157.

PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF AN AFFIDAVIT, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Via Fax (225) 687-1814

Ms. Liz Troxclair
Legal Advertising
The Plaquemine Post South
Post Office Box 589
Plaquemine, LA 70765-0589

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Ms. Troxclair:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in The Plaquemine Post South once only on Thursday, June 4, 2009. You will also receive a copy of the legal notice itself via email at pscirculation@postsouth.com.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277 or email laura.ambeau@la.gov.

Charges for this service should be billed to:

Mr. Richard B. Boudreau
Sr. Staff Engineer, Environmental
Syngenta Crop Protection, Inc.
3905 Highway 75
St. Gabriel, LA 70776
225-642-1257

The original proof of publications IN THE FORM OF TEAR SHEETS should be mailed to the attention of Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, Post Office Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura M. Ambeau".

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments/2

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the _____ (date of publication) edition of **The Plaquemine Post South**:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-I-MO-I, PER20070027

THE PLAQUEMINE POST SOUTH:

By: _____ Date: _____

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau (225) 325-8157.

PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF A TEAR SHEET, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Phone (214) 665-6669

Mr. Kishor Fruitwala
U. S. EPA, Region VI
1445 Ross Avenue, Suite 1200
Mail Code: 6PDA
Dallas, Texas 75202-2733

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the final hazardous waste operating permit modification and legal notice that is scheduled to be published in The Advocate and The Post South on June 4, 2009.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Enclosures

VERIFICATION BY EPA

The undersigned verifies that the EPA Region VI Office has received a copy of the final hazardous waste operating permit modification and public notice regarding:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

EPA Region VI:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Telephone (225) 687-2520

Dan J. Ball, Director
Iberville Parish Library
Headquarters
24605 J. Gerald Berret Boulevard
Plaquemine, LA 70764-0736

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Mr. Ball:

We request that the enclosed final hazardous waste operating permit and public notice for the referenced facility, be made available for public review upon receipt. It is imperative that the documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The material should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura M. Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/2

VERIFICATION BY LIBRARY

The undersigned verifies that the Iberville Parish Library, Headquarters has received the material associated with the following public notice:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

IBERVILLE PARISH LIBRARY, HEADQUARTERS

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Phone (225) 647-8924

Nate Stewart, Branch Manager
Ascension Parish Library
Gonzales Branch
708 S. Irma Blvd.
Gonzales, Louisiana 70737

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-I-MO-I, PER20070027

Dear Mr. Stewart:

We request that the enclosed final hazardous waste operating permit and public notice for the referenced facility, be made available for public review upon receipt. It is imperative that the documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The material should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/2

VERIFICATION BY LIBRARY

The undersigned verifies that the Ascension Parish Library, Gonzales Branch, has received a copy of the final class 3 modified hazardous waste operating permit material associated with the following public notice:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-1-MO-1, PER20070027

ASCENSION PARISH LIBRARY, GONZALES BRANCH:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Telephone (225) 642-8380
Fax (225) 642-8381

Lydia Haydel, Director
Iberville Parish Library
East Iberville Branch
5715 Monticello Street
St. Gabriel, LA 70776

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-I-MO-I, PER20070027

Dear Ms. Haydel:

We request that the enclosed final hazardous waste operating permit document and public notice for the referenced facility, be made available for public review upon receipt. It is imperative that the documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The material should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura M. Ambeau".

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/2

VERIFICATION BY LIBRARY

The undersigned verifies that the Iberville Parish Library, East Iberville Branch, has received a copy of the final class 3 modified hazardous waste operating permit material associated with the following public notice:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

IBERVILLE PARISH LIBRARY, EAST IBERVILLE BRANCH:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

225-687-3257

Jessel "Mitchell" Ourso, Parish President
Iberville Parish Council
58050 Meriam Street
Plaquemine, LA 70565-0389

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

Dear Parish President Ourso:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the final hazardous waste operating permit and legal notice that is scheduled to be published in The Advocate and The Post South on June 4, 2009.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura M. Ambeau".

Laura M. Ambeau
Environmental Scientist, Public Participation Group

LA

Enclosures/2

VERIFICATION BY PARISH GOVERNMENT

The undersigned verifies that the Parish President, Iberville Parish Council has received a copy of the final hazardous waste operating permit regarding:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

Iberville Parish Government:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277

FAX (225) 325-8157

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

May 27, 2009

Phone: (225) 219-3600

Fax: (225) 219-3695

Mr. Bobby Mayweather
Capital Regional Office
602 North 5th Street
Baton Rouge, La. 70821-4312

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO AI2367, LAD053783445-OP-RN-I-MO-1, PER20070027

Dear Mr. Mayweather:

The Louisiana Department of Environmental Quality (LDEQ) is informing you of the final hazardous waste operating permit and legal notice that is scheduled to be published in The Advocate and The Post South on June 4, 2009.

Should you have any questions regarding the facility, additional permit information may be obtained from Mr. Keith Williams, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3070.

Sincerely,

A handwritten signature in cursive script, appearing to read "Laura Ambeau".

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Enclosures

VERIFICATION BY REGIONAL OFFICE

The undersigned verifies that the Capital Regional Office has received a copy of the final hazardous waste operating permit and public notice regarding:

RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027

Capital Regional Office:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157

VERIFICATION FOR DELIVERY OF MATERIAL TO BE SCANNED

**THIS INFORMATION IS EXPECTED TO BE AVAILABLE ON EDMS
48 HOURS FROM THE DELIVERY DATE**

Public Notice Date: Thursday, June 4, 2009

**The undersigned verifies that a copy of the public notice and related material for the
referenced facility has been received by the First Floor Scanning Center:**

**RE: FINAL CLASS 3 MODIFIED HAZARDOUS WASTE OPERATING PERMIT
SYNGENTA CROP PROTECTION, INC., ST. GABRIEL FACILITY
ST. GABRIEL, IBERVILLE PARISH, LOUISIANA
AGENCY INTEREST NO A12367, LAD053783445-OP-RN-1-MO-1, PER20070027**

The Material Was Delivered:

**By: _____ Date: _____
_____ Time _____**


.....

**The Public Participation Group contact for this packet of information is
Laura Ambeau, Rm. 321-31, 2-3277**

PART A

APPLICATION

AI 2367

MAIL COMPLETED FORM TO: LDEQ/OES/ Environmental Assistance Division/CAS PO Box 4313 Baton Rouge, LA 70821-4313	United States Environmental Protection Agency and STATE OF LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY RCRA SUBTITLE C SITE IDENTIFICATION FORM	
1. Reason for Submittal CHOOSE ONLY ONE REASON PER SUBMITTAL	A. Reason for Submittal: <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). or <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). or <input type="checkbox"/> As a component of the Hazardous Waste Report.	
	B. Number of Employees: 687	
2. Site EPA ID Number	EPA ID Number: LAD053783445 334054	
3. Site Name	Legal Name: Syngenta Crop Protection, Inc.	
4. Site Location (Physical address, NOT PO Box or Route)	Street Address: 3905 Hwy 76 City, Town, or Village: St Gabriel State: Louisiana County/Parish Name: Iberville Zip Code: 70776	
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	
6. North American Industry Classification System (NAICS) Code(s)	A. 325188 B. 325199 C. 32532 D.	
7. Site Mailing Address	Street or P. O. Box: P.O. Box 11 City, Town, or Village: St. Gabriel State: Louisiana County/Parish Name: Iberville Zip Code: 70776	
8. Site Contact Person	First Name: Richard MI: B Last Name: Boudreau Phone Number: 225-642-1257 Phone Number Extension:	
9. Legal Owner and Operator of the Site (see instructions)	A. Name of Site's Legal Owner: Syngenta Crop Protection, Inc. Date Became Owner (mm/dd/yyyy): 01/01/01 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other B. Name of Site's Operator: Syngenta Crop Protection, Inc. Date Became Operator (mm/dd/yyyy): 01/01/01 Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other	

Regs & Certs

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EPA ID No. L A D 0 5 3 7 8 3 4 4 5

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes)**A. Hazardous Waste Activities****1. Generator of Hazardous Waste**

(Select one of the following categories)

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs.)
Non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.)
Non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo
Non-acute hazardous waste☐ d. NON-GENERATOR

In addition, indicate other generator activities (check all that apply)

☒ e. United States Importer of Hazardous Waste*☐ f. Mixed Waste (hazardous and radioactive) Generator

* permitted to receive waste from NAFTA entities, but have not yet imported waste.

For Items 2 through 6, check all that apply:

☐ 2. Transporter of Hazardous Waste☐ Transfer Facility Status
(Transporter status must be indicated above)☒ 3. Treater, Storer, or Disposer of HW (at your site)
Note: A hazardous waste permit is required for this activity.☐ Permitted ☐ Interim Status ☐ Proposed☒ 4. Recycler of Hazardous Waste (at your site)
Note: A hazardous waste permit may be required for this activity.☐ 5. Exempt Boiler and/or Industrial Furnace☐ a. Small Quantity On-site Burner Exemption
☐ b. Smelting, Melting, Refining Furnace Exemption☐ 6. Underground Injection Control**B. Universal Waste Activities (Indicate Activity Type)**☒ 1. Large Quantity Handler of Universal Waste (refer to your State regulations to determine what is regulated). Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Antifreeze	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Mercury-containing equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Electronics	<input checked="" type="checkbox"/>	<input type="checkbox"/>

☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Indicate Activity Type)☐ 1. Used Oil Transporter☐ a. Transporter
☐ b. Transfer Facility☐ 2. Used Oil Processor and/or Re-refiner☐ a. Processor
☐ b. Re-refiner☐ 3. Off-Specification Used Oil Burner☐ 4. Used Oil Fuel Marketer☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications☐ 5. Used Oil Fuel Burner
(Indicate Combustion Device(s))☐ Utility Boiler ☐ Industrial Boiler ☐ Industrial Furnace**11. Description of Hazardous Wastes****A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D010	D012	D013	D014

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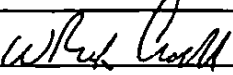
EPA ID No. L A D O S 3 7 8 3 4 4 5

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

D015	D016	D017	D018	D019	D020	D021
D022	D023	D024	D025	D026	D027	D028
D029	D030	D031	D032	D033	D034	D035
D036	D037	D038	D039	D040	D041	D042
D043	F001	F002	F003	F004	F005	F024
K157	K158	K159				

12. Comments : See attached page for additional codes.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	W. Ralph Caddell, Site Manager	07-17-2007

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SYNGENTA CROP PROTECTION, INC.
ST. GABRIEL FACILITY
DESCRIPTION OF REGULATED WASTES
COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTE

P001	P002	P003	P004	P005	P006	P007	P008
P009	P010	P011	P012	P013	P014	P015	P016
P017	P018	P020	P021	P022	P023	P024	P026
P027	P028	P029	P030	P031	P033	P034	P036
P037	P038	P039	P040	P041	P042	P043	P044
P045	P046	P047	P048	P049	P050	P051	P054
P056	P057	P058	P059	P060	P062	P063	P064
P065	P066	P067	P068	P069	P070	P071	P072
P073	P074	P075	P076	P077	P078	P081	P082
P084	P085	P087	P088	P089	P092	P093	P094
P095	P096	P097	P098	P099	P101	P102	P103
P104	P105	P106	P108	P109	P110	P111	P112
P113	P114	P115	P116	P118	P119	P120	P121
P122	P123	P127	P128	P185	P188	P189	P190
P191	P192	P194	P196	P197	P198	P199	P201
P202	P203	P204	P205	U001	U002	U003	U004
U005	U006	U007	U008	U009	U010	U011	U012
U014	U015	U016	U017	U018	U019	U020	U021
U022	U023	U024	U025	U026	U027	U028	U029
U030	U031	U032	U033	U034	U035	U036	U037
U038	U039	U041	U042	U043	U044	U045	U046
U047	U048	U049	U050	U051	U052	U053	U055
U056	U057	U058	U059	U060	U061	U062	U063
U064	U066	U067	U068	U069	U070	U071	U072
U073	U074	U075	U076	U077	U078	U079	U080
U081	U082	U083	U084	U085	U086	U087	U088
U089	U090	U091	U092	U093	U094	U095	U096
U097	U098	U099	U101	U102	U103	U105	U106
U107	U108	U109	U110	U111	U112	U113	U114
U115	U116	U117	U118	U119	U120	U121	U122
U123	U124	U125	U126	U127	U128	U129	U130
U131	U132	U133	U134	U135	U136	U137	U138
U140	U141	U142	U143	U144	U145	U146	U147
U148	U149	U150	U151	U152	U153	U154	U155
U156	U157	U158	U159	U160	U161	U162	U163
U164	U165	U166	U167	U168	U169	U170	U171
U172	U173	U174	U176	U177	U178	U179	U180
U181	U182	U183	U184	U185	U186	U187	U188
U189	U190	U191	U192	U193	U194	U196	U197
U200	U201	U202	U203	U204	U205	U206	U207
U208	U209	U210	U211	U213	U214	U215	U216
U217	U218	U219	U220	U221	U222	U223	U225
U226	U227	U228	U234	U235	U236	U237	U238
U239	U240	U243	U244	U246	U247	U248	U249
U271	U278	U279	U280	U328	U353	U359	U364
U367	U372	U373	U387	U389	U394	U395	U404
U409	U410	U411					

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Syngenta Crop Protection, Inc
Post Office Box 11
St. Gabriel, LA 70776

Tel. 225 642 1100



July 17, 2007

Certified Mail:7005 0390 0003 3356 5355

Bijan Sharafkhani
Administrator
Louisiana Department of Environmental Quality
Office of Environmental Services-Waste Permits
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Re: Syngenta Crop Protection, Inc.-St. Gabriel Plant (Syngenta) Updated HW-1 Form

LAD053783445-RN-OP-1 AI #2367

Dear Mr. Sharafkhani:

Enclosed is a completed, updated HW-1 Form for the Syngenta Crop Protection, Inc.-St. Gabriel, LA Site.

If you have any questions please contact me at 225-642-1257.

Sincerely,

A handwritten signature in black ink, reading "Richard B. Boudreau".

Richard B. Boudreau
Sr. Staff Environmental Engineer

cc: Ms. Amy Exnicios-LDEQ, Office Environmental Services, Waste Permits Section-

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United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

Facility Permit Contact (See instructions on page 35)	First Name: RICHARD		MI: B	Last Name: BOUDREAU	
	Phone Number: (225) 642-1257			Phone Number Extension:	
2. Facility Permit Contact Mailing Address (See instructions on page 35)	Street or P.O. Box: 3905 HWY 75				
	City, Town, or Village: ST. GABRIEL				
	State: LOUISIANA				
	Country: USA		Zip Code: 70776		
3. Legal Owner Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: P.O. BOX 18300, 410 SWING ROAD				
	City, Town, or Village: GREENSBORO				
	State: NORTH CAROLINA				
	Country: USA		Zip Code: 27419-8300		Phone Number: (336) 632-6000
4. Operator Mailing Address and Telephone Number (See instructions on page 36)	Street or P.O. Box: P.O. BOX 11				
	City, Town, or Village: ST. GABRIEL				
	State: LOUISIANA				
	Country: USA		Zip Code: 70776		Phone Number: (225) 642-1100
5. Facility Existence Date (See instructions on page 36)	Facility Existence Date (mm/dd/yyyy): LIQUID INCINERATOR - 11/29/1989 (INACTIVE-TO BE CLOSED) MULTI-PURPOSE INCINERATOR-5/15/1996 (ACTIVE-RENEWAL APPLICATION SUBMITTED APRIL 2001)				
6. Other Environmental Permits (See instructions on page 36)					
A. Permit Type (Enter code)	B. Permit Number			C. Description	
	SEE ATTACHED LISTED IN ITEM 6 ADDENDUM				
7. Nature of Business (Provide a brief description; see instructions on page 37)					
SEE ATTACHED IN ITEM 7 ADDENDUM					

6. OTHER ENVIRONMENTAL PERMITS (ADDENDUM)

<u>A. Permit Type</u> <u>(Code)</u>	<u>B. Permit Number</u>	<u>C. Description</u>
E	1280-00007-14	State Air Permit
E	1280-0029-08	State Air Permit
E	2871-VO	Tank T-1013-Title V
E	2842-VO	MPF Unit-Title V
E	2793	State Air Permit
E	2718-VO	Environmental Operations-Title V
E	2697	State Air Permit
E	2532	State Air Permit
E	2532-M1	State Air Permit
E	2687	State Air Permit
E	2610-VO	Utilities Area-Title V
N	LAD0005487	NPDES Permit
N	LAD00095478	NPDES Permit
E	GD-047-0224/P-0017	State Solid Waste Permit
R	LAD053783445-MO-1	RCRA Permit
U	94-05 WD; 970940	State UI Permit Well #2
U	94-01 WD; 971203	State UI Permit Well #3
E	2697	State Air Permit
E	2504	State Air Permit
E	2462	State Air Permit
E	GD-047-0224/P-0311	Beneficial Use Permit
E	WP-0926	LWPDS Permit
E	LA-2219-L01	Radiation

7. NATURE OF BUSINESS (ADDENDUM)

On January 1, 2001, Zeneca Ag Products, Inc. merged into Novartis Crop Protection, Inc., with Novartis Crop Protection, Inc. continuing as the surviving corporate entity in the United States. At the same time, on January 1, 2001, Novartis Crop Protection, Inc. changed its name to Syngenta Crop Protection, Inc. The Syngenta Crop Protection, Inc. headquarters are located in Greensboro, North Carolina and is a wholly-owned subsidiary of Syngenta Corporation, whose corporate offices are located in Wilmington, Delaware. On January 1, 2001, the Novartis Crop Protection, Inc., St. Gabriel Plant changed its name to Syngenta Crop Protection, Inc. Also, as of January 1, 2001, the Zeneca Ag Products, Inc., St. Gabriel Plant commenced to consolidate into the former Novartis Crop Protection, Inc., St. Gabriel Plant to become one Syngenta Crop Protection, Inc., St. Gabriel Plant site, under one site manager with one EPA I.D. number, EPA I.D. # LAD053783445-MO-1 and Agency Interest # 2367. The site property description and plot plan have been revised to reflect the new Syngenta Crop Protection, Inc., St. Gabriel Plant site.

The Syngenta Crop Protection, Inc., St. Gabriel facility manufactures and formulates pesticides and specialty chemicals. Specific processes include: 1) manufacture, formulation and packaging of s-triazine herbicides, 2) manufacture of hydrogen cyanide, a raw material, 3) manufacture, formulation and packaging activities for various other pesticides, intermediates and specialty chemicals, and 4) supportive activities for the above which included effluent treatment systems, maintenance, utilities, analytical and quality control. As a result of the various processes employed at the St. Gabriel facility, by-products and non-recyclable (hazardous and non-hazardous) wastes are produced, stored and treated by incineration on-site. Additionally, compatible hazardous and non-hazardous wastes generated by the other off-site Syngenta facilities, subsidiaries and associated facilities are stored and incinerated in the St. Gabriel Plant multi-purpose rotary kiln incinerator and associated facilities.

Plant Operations

The plant operates on a twenty-four (24) hour basis, seven (7) days per week. The Syngenta Crop Protection, Inc., St. Gabriel Plant, is presently classified as a generator, storer and treater and hazardous waste. Some hazardous wastes are recycled by returning to the process from which they were generated or reused in other similar processes.

9. Process Codes and Design Capacities (See instructions on page 37)

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.

B. PROCESS DESIGN CAPACITY - For each code entered in column A, enter the capacity of the process.

1. **AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. **UNIT OF MEASURE** - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal: Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D80	Landfill	Acre-feet; Hectare-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kilo	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S01	Storage: Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S04	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S05	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid Halogen Acid Furnaces Other Industrial Furnaces Listed In 40 CFR §260.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T92		
	Other Storage	Any Unit of Measure Listed Below	T93		
	Treatment: Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour		Miscellaneous (Subpart X)	
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
			X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G
Gallons Per Hour.....	E
Gallons Per Day.....	U
Liters.....	L
Liters Per Hour.....	H
Liters Per Day.....	V

UNIT OF MEASURE	UNIT OF MEASURE CODE
Short Tons Per Hour.....	D
Metric Tons Per Hour.....	W
Short Tons Per Day.....	N
Metric Tons Per Day.....	S
Pounds Per Hour.....	J
Kilograms Per Hour.....	R
Million Btu Per Hour.....	X

UNIT OF MEASURE	UNIT OF MEASURE CODE
Cubic Yards.....	Y
Cubic Meters.....	C
Acres.....	B
Acre-feet.....	A
Hectares.....	Q
Hectare-meter.....	F
Btu Per Hour.....	I

9. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		(2) Unit of Measure (Enter code)	C. Process Total Number of Units	For Official Use Only				
	(1) Amount (Specify)											
X 1	S	0	2	5 3 3 7 8 8		G	0 0 1					
1	S	0	1	WAREHOUSE	46000	G	0 0 1					
2	S	0	1	OUTSIDE STORAGE	75000	G	0 0 1					
3	S	0	1	TRUCK UNLOADING	12000	G	0 0 1					
4	S	0	2	TANKS (ORGANIC)	83100**	G	0 0 5					
5	S	0	2	TANKS (AQUEOUS)	93550**	G	0 0 3					
6	S	0	2	TANKS (SOLIDS/SEMI)	37500	G	0 0 2					
7	S	0	2	TANKS (FLUE GAS RESIDUALS)	6400	G	0 0 2					
8	T	0	3	ROTARY KILN	12067	J	0 0 1					
9	T	0	3	SECONDARY COMBUSTION	8200	J	0 0 1					
10	S	0	2	AQ. TANK (INSTALLED LATER)	*94000	G	0 0 5					
11	S	0	2	ORG TANK (INSTALLED LATER)	*69000	G	0 0 4					
12				**ONE 24,300 GAL TANK COUNTED AS ORG. CAN ALSO BE USED AS AQUEOUS								
13				*TO BE INSTALLED AT A LATER DATE								

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (as in sequence with Item 8)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)			(2) Unit of Measure (Enter code)			
X 1	T	0	4				In-situ Vitrification
1							
2							
3							
4							

10. Description of Hazardous Wastes (See instructions on page 37)

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
	(1) PROCESS CODES (Enter code)						(2) PROCESS DESCRIPTION (If a code is not entered in D(1))									
X 1	K	0	5	4	900	P	T	0	3	D	8	0				
X 2	D	0	0	2	400	P	T	0	3	D	8	0				
X 3	D	0	0	1	100	P	T	0	3	D	8	0				
X 4	D	0	0	2												Included With Above

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES									
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))					
1	D	0	0	1	5000	T	S	0	1	S	0	2	T	0	3	
2	D	0	0	2	500	T	S	0	1	S	0	2	T	0	3	
3	D	0	0	3	200	T	S	0	1	S	0	2	T	0	3	
4	D	0	0	4	20	T	S	0	1	S	0	2	T	0	3	
5	D	0	0	5	10	T	S	0	1	S	0	2	T	0	3	
6	D	0	0	6	10	T	S	0	1	S	0	2	T	0	3	
7	D	0	0	7	100	T	S	0	1	S	0	2	T	0	3	
8	D	0	0	8	10	T	S	0	1	S	0	2	T	0	3	
9	D	0	0	9	10	T	S	0	1	S	0	2	T	0	3	
0	D	0	1	0	10	T	S	0	1	S	0	2	T	0	3	
1	D	0	1	1	10	T	S	0	1	S	0	2	T	0	3	
2	D	0	1	2	10	T	S	0	1	S	0	2	T	0	3	
3	D	0	1	3	20	T	S	0	1	S	0	2	T	0	3	
4	D	0	1	4	10	T	S	0	1	S	0	2	T	0	3	
5	D	0	1	5	10	T	S	0	1	S	0	2	T	0	3	
6	D	0	1	6	100	T	S	0	1	S	0	2	T	0	3	
7	D	0	1	7	10	T	S	0	1	S	0	2	T	0	3	
8	D	0	1	8	50	T	S	0	1	S	0	2	T	0	3	
9	D	0	1	9	200	T	S	0	1	S	0	2	T	0	3	
0	D	0	2	0	1	T	S	0	1	S	0	2	T	0	3	
1	D	0	2	1	100	T	S	0	1	S	0	2	T	0	3	
2	D	0	2	2	500	T	S	0	1	S	0	2	T	0	3	
3	D	0	2	3	1	T	S	0	1	S	0	2	T	0	3	
4	D	0	2	4	1	T	S	0	1	S	0	2	T	0	3	
5	D	0	2	5	1	T	S	0	1	S	0	2	T	0	3	
6	D	0	2	6	1	T	S	0	1	S	0	2	T	0	3	
7	D	0	2	7	10	T	S	0	1	S	0	2	T	0	3	
8	D	0	2	8	10	T	S	0	1	S	0	2	T	0	3	
9	D	0	2	9	10	T	S	0	1	S	0	2	T	0	3	
0	D	0	3	0	1	T	S	0	1	S	0	2	T	0	3	
1	D	0	3	1	1	T	S	0	1	S	0	2	T	0	3	
2	D	0	3	2	1	T	S	0	1	S	0	2	T	0	3	
3	D	0	3	3	1	T	S	0	1	S	0	2	T	0	3	

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																
4	D	0	3	4	1	T	S	0	1	S	0	2	T	0	3		
5	D	0	3	5	10	T	S	0	1	S	0	2	T	0	3		
6	D	0	3	6	1	T	S	0	1	S	0	2	T	0	3		
7	D	0	3	7	1	T	S	0	1	S	0	2	T	0	3		
8	D	0	3	8	10	T	S	0	1	S	0	2	T	0	3		
9	D	0	3	9	500	T	S	0	1	S	0	2	T	0	3		
0	D	0	4	0	100	T	S	0	1	S	0	2	T	0	3		
1	D	0	4	1	1	T	S	0	1	S	0	2	T	0	3		
2	D	0	4	2	1	T	S	0	1	S	0	2	T	0	3		
3	D	0	4	3	1	T	S	0	1	S	0	2	T	0	3		
4	F	0	0	1	10	T	S	0	1	S	0	2	T	0	3		
5	F	0	0	2	100	T	S	0	1	S	0	2	T	0	3		
6	F	0	0	3	1000	T	S	0	1	S	0	2	T	0	3		
7	F	0	0	4	10	T	S	0	1	S	0	2	T	0	3		
8	F	0	0	5	1000	T	S	0	1	S	0	2	T	0	3		
9	F	0	2	4	1	T	S	0	1	S	0	2	T	0	3		
	K	1	5	7	1	T	S	0	1	S	0	2	T	0	3		
	K	1	5	8	1	T	S	0	1	S	0	2	T	0	3		
2	K	1	5	9	100	T	S	0	1	S	0	2	T	0	3		
3	P	0	0	1	1	T	S	0	1	S	0	2	T	0	3		
4	P	0	0	2	1	T	S	0	1	S	0	2	T	0	3		
5	P	0	0	3	1	T	S	0	1	S	0	2	T	0	3		
6	P	0	0	4	1	T	S	0	1	S	0	2	T	0	3		
7	P	0	0	5	1	T	S	0	1	S	0	2	T	0	3		
8	P	0	0	6	1	T	S	0	1	S	0	2	T	0	3		
9	P	0	0	7	1	T	S	0	1	S	0	2	T	0	3		
0	P	0	0	8	1	T	S	0	1	S	0	2	T	0	3		
1	P	0	0	9	1	T	S	0	1	S	0	2	T	0	3		
2	P	0	1	0	1	T	S	0	1								
3	P	0	1	1	1	T	S	0	1								
4	P	0	1	2	1	T	S	0	1								
5	P	0	1	3	1	T	S	0	1								
6	P	0	1	4	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																	
5	7	P	0	1	5	1	T	S	0	1	S	0	2	T	0	3		
5	8	P	0	1	6	1	T	S	0	1	S	0	2	T	0	3		
5	9	P	0	1	7	1	T	S	0	1	S	0	2	T	0	3		
7	0	P	0	1	8	1	T	S	0	1	S	0	2	T	0	3		
7	1	P	0	2	0	1	T	S	0	1	S	0	2	T	0	3		
7	2	P	0	2	1	1	T	S	0	1	S	0	2	T	0	3		
7	3	P	0	2	2	1	T	S	0	1	S	0	2	T	0	3		
7	4	P	0	2	3	1	T	S	0	1	S	0	2	T	0	3		
7	5	P	0	2	4	1	T	S	0	1	S	0	2	T	0	3		
7	6	P	0	2	6	1	T	S	0	1	S	0	2	T	0	3		
7	7	P	0	2	7	1	T	S	0	1	S	0	2	T	0	3		
7	8	P	0	2	8	1	T	S	0	1	S	0	2	T	0	3		
7	9	P	0	2	9	1	T	S	0	1	S	0	2	T	0	3		
8	0	P	0	3	0	20	T	S	0	1	S	0	2	T	0	3		
8	1	P	0	3	1	10	T	S	0	1	S	0	2	T	0	3		
8	2	P	0	3	3	20	T	S	0	1	S	0	2	T	0	3		
8	3	P	0	3	4	1	T	S	0	1	S	0	2	T	0	3		
8	4	P	0	3	6	1	T	S	0	1	S	0	2	T	0	3		
8	5	P	0	3	7	1	T	S	0	1	S	0	2	T	0	3		
8	6	P	0	3	8	1	T	S	0	1	S	0	2	T	0	3		
8	7	P	0	3	9	1	T	S	0	1	S	0	2	T	0	3		
8	8	P	0	4	0	1	T	S	0	1	S	0	2	T	0	3		
8	9	P	0	4	1	1	T	S	0	1	S	0	2	T	0	3		
8	0	P	0	4	2	1	T	S	0	1	S	0	2	T	0	3		
8	1	P	0	4	3	1	T	S	0	1	S	0	2	T	0	3		
8	2	P	0	4	4	1	T	S	0	1	S	0	2	T	0	3		
8	3	P	0	4	5	1	T	S	0	1	S	0	2	T	0	3		
8	4	P	0	4	6	1	T	S	0	1	S	0	2	T	0	3		
8	5	P	0	4	7	1	T	S	0	1	S	0	2	T	0	3		
8	6	P	0	4	8	1	T	S	0	1	S	0	2	T	0	3		
8	7	P	0	4	9	1	T	S	0	1	S	0	2	T	0	3		
8	8	P	0	5	0	1	T	S	0	1	S	0	2	T	0	3		
8	9	P	0	5	1	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
							(1) PROCESS CODES (Enter code)										
0	P	0	5	4	1	T	S	0	1	S	0	2	T	0	3		
1	P	0	5	6	1	T	S	0	1	S	0	2	T	0	3		
2	P	0	5	7	1	T	S	0	1	S	0	2	T	0	3		
3	P	0	5	8	1	T	S	0	1	S	0	2	T	0	3		
4	P	0	5	9	1	T	S	0	1	S	0	2	T	0	3		
5	P	0	6	0	1	T	S	0	1	S	0	2	T	0	3		
6	P	0	6	2	1	T	S	0	1	S	0	2	T	0	3		
7	P	0	6	3	1	T	S	0	1	S	0	2	T	0	3		
8	P	0	6	4	1	T	S	0	1	S	0	2	T	0	3		
9	P	0	6	5	1	T	S	0	1	S	0	2	T	0	3		
0	P	0	6	6	1	T	S	0	1	S	0	2	T	0	3		
1	P	0	6	7	1	T	S	0	1	S	0	2	T	0	3		
2	P	0	6	8	1	T	S	0	1	S	0	2	T	0	3		
3	P	0	6	9	20	T	S	0	1	S	0	2	T	0	3		
4	P	0	7	0	10	T	S	0	1	S	0	2	T	0	3		
	P	0	7	1	10	T	S	0	1	S	0	2	T	0	3		
	P	0	7	2	1	T	S	0	1	S	0	2	T	0	3		
7	P	0	7	3	1	T	S	0	1	S	0	2	T	0	3		
8	P	0	7	4	1	T	S	0	1								
9	P	0	7	5	1	T	S	0	1	S	0	2	T	0	3		
0	P	0	7	6	1	T	S	0	1	S	0	2	T	0	3		
1	P	0	7	7	1	T	S	0	1	S	0	2	T	0	3		
2	P	0	7	8	1	T	S	0	1	S	0	2	T	0	3		
3	P	0	8	1	1	T	S	0	1	S	0	2	T	0	3		
4	P	0	8	2	1	T	S	0	1	S	0	2	T	0	3		
5	P	0	8	4	1	T	S	0	1	S	0	2	T	0	3		
6	P	0	8	5	1	T	S	0	1	S	0	2	T	0	3		
7	P	0	8	7	1	T	S	0	1	S	0	2	T	0	3		
8	P	0	8	8	1	T	S	0	1	S	0	2	T	0	3		
9	P	0	8	9	1	T	S	0	1	S	0	2	T	0	3		
0	P	0	9	2	1	T	S	0	1	S	0	2	T	0	3		
1	P	0	9	3	1	T	S	0	1	S	0	2	T	0	3		
2	P	0	9	4	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																
	S	0	1	S			0	2	T	0	3						
33	P	0	9	5	1	T	S	0	1	S	0	2	T	0	3		
34	P	0	9	6	1	T	S	0	1	S	0	2	T	0	3		
35	P	0	9	7	1	T	S	0	1	S	0	2	T	0	3		
36	P	0	9	8	1	T	S	0	1	S	0	2	T	0	3		
37	P	0	9	9	1	T	S	0	1	S	0	2	T	0	3		
38	P	1	0	1	1	T	S	0	1	S	0	2	T	0	3		
39	P	1	0	2	1	T	S	0	1	S	0	2	T	0	3		
40	P	1	0	3	1	T	S	0	1	S	0	2	T	0	3		
41	P	1	0	4	1	T	S	0	1	S	0	2	T	0	3		
42	P	1	0	5	1	T	S	0	1	S	0	2	T	0	3		
43	P	1	0	6	1	T	S	0	1	S	0	2	T	0	3		
44	P	1	0	8	1	T	S	0	1	S	0	2	T	0	3		
45	P	1	0	9	1	T	S	0	1	S	0	2	T	0	3		
46	P	1	1	0	1	T	S	0	1	S	0	2	T	0	3		
47	P	1	1	1	1	T	S	0	1	S	0	2	T	0	3		
	P	1	1	2	1	T	S	0	1	S	0	2	T	0	3		
	P	1	1	3	1	T	S	0	1	S	0	2	T	0	3		
50	P	1	1	4	1	T	S	0	1	S	0	2	T	0	3		
51	P	1	1	5	1	T	S	0	1	S	0	2	T	0	3		
52	P	1	1	6	1	T	S	0	1	S	0	2	T	0	3		
53	P	1	1	8	1	T	S	0	1	S	0	2	T	0	3		
54	P	1	1	9	1	T	S	0	1	S	0	2	T	0	3		
55	P	1	2	0	1	T	S	0	1	S	0	2	T	0	3		
56	P	1	2	1	1	T	S	0	1	S	0	2	T	0	3		
57	P	1	2	2	1	T	S	0	1	S	0	2	T	0	3		
58	P	1	2	3	1	T	S	0	1	S	0	2	T	0	3		
59	P	1	2	7	1	T	S	0	1	S	0	2	T	0	3		
60	P	1	2	8	1	T	S	0	1	S	0	2	T	0	3		
61	P	1	8	5	1	T	S	0	1	S	0	2	T	0	3		
62	P	1	8	8	1	T	S	0	1	S	0	2	T	0	3		
63	P	1	8	9	1	T	S	0	1	S	0	2	T	0	3		
64	P	1	9	0	1	T	S	0	1	S	0	2	T	0	3		
65	P	1	9	1	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)																
Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES									
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))					
6	P	1	9	2	1	T	S	0	1	S	0	2	T	0	3	
7	P	1	9	4	1	T	S	0	1	S	0	2	T	0	3	
8	P	1	9	6	1	T	S	0	1	S	0	2	T	0	3	
9	P	1	9	7	1	T	S	0	1	S	0	2	T	0	3	
0	P	1	9	8	1	T	S	0	1	S	0	2	T	0	3	
1	P	1	9	9	1	T	S	0	1	S	0	2	T	0	3	
2	P	2	0	1	1	T	S	0	1	S	0	2	T	0	3	
3	P	2	0	2	1	T	S	0	1	S	0	2	T	0	3	
4	P	2	0	3	1	T	S	0	1	S	0	2	T	0	3	
5	P	2	0	4	1	T	S	0	1	S	0	2	T	0	3	
6	P	2	0	5	1	T	S	0	1	S	0	2	T	0	3	
7	U	0	0	1	1	T	S	0	1	S	0	2	T	0	3	
8	U	0	0	2	1	T	S	0	1	S	0	2	T	0	3	
9	U	0	0	3	1	T	S	0	1	S	0	2	T	0	3	
0	U	0	0	4	1	T	S	0	1	S	0	2	T	0	3	
1	U	0	0	5	1	T	S	0	1	S	0	2	T	0	3	
2	U	0	0	6	1	T	S	0	1	S	0	2	T	0	3	
3	U	0	0	7	1	T	S	0	1	S	0	2	T	0	3	
4	U	0	0	8	1	T	S	0	1	S	0	2	T	0	3	
5	U	0	0	9	1	T	S	0	1	S	0	2	T	0	3	
6	U	0	1	0	1	T	S	0	1	S	0	2	T	0	3	
7	U	0	1	1	1	T	S	0	1	S	0	2	T	0	3	
8	U	0	1	2	1	T	S	0	1	S	0	2	T	0	3	
9	U	0	1	4	1	T	S	0	1	S	0	2	T	0	3	
0	U	0	1	5	1	T	S	0	1	S	0	2	T	0	3	
1	U	0	1	6	1	T	S	0	1	S	0	2	T	0	3	
2	U	0	1	7	1	T	S	0	1	S	0	2	T	0	3	
3	U	0	1	8	1	T	S	0	1	S	0	2	T	0	3	
4	U	0	1	9	1	T	S	0	1	S	0	2	T	0	3	
5	U	0	2	0	1	T	S	0	1	S	0	2	T	0	3	
6	U	0	2	1	1	T	S	0	1	S	0	2	T	0	3	
7	U	0	2	2	1	T	S	0	1	S	0	2	T	0	3	
8	U	0	2	3	1	T	S	0	1	S	0	2	T	0	3	

D. Description of Hazardous Wastes (Continued; Additional Sheet)

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																
199	U	0	2	4	1	T	S	0	1	S	0	2	T	0	3		
200	U	0	2	5	1	T	S	0	1	S	0	2	T	0	3		
201	U	0	2	6	1	T	S	0	1	S	0	2	T	0	3		
202	U	0	2	7	1	T	S	0	1	S	0	2	T	0	3		
203	U	0	2	8	1	T	S	0	1	S	0	2	T	0	3		
204	U	0	2	9	1	T	S	0	1	S	0	2	T	0	3		
205	U	0	3	0	1	T	S	0	1	S	0	2	T	0	3		
206	U	0	3	1	1	T	S	0	1	S	0	2	T	0	3		
207	U	0	3	2	1	T	S	0	1								
208	U	0	3	3	1	T	S	0	1	S	0	2	T	0	3		
209	U	0	3	4	1	T	S	0	1	S	0	2	T	0	3		
210	U	0	3	5	1	T	S	0	1	S	0	2	T	0	3		
211	U	0	3	6	1	T	S	0	1	S	0	2	T	0	3		
212	U	0	3	7	1	T	S	0	1	S	0	2	T	0	3		
213	U	0	3	8	1	T	S	0	1	S	0	2	T	0	3		
214	U	0	3	9	1	T	S	0	1	S	0	2	T	0	3		
215	U	0	4	1	1	T	S	0	1	S	0	2	T	0	3		
216	U	0	4	2	1	T	S	0	1	S	0	2	T	0	3		
217	U	0	4	3	1	T	S	0	1	S	0	2	T	0	3		
218	U	0	4	4	1	T	S	0	1	S	0	2	T	0	3		
219	U	0	4	5	1	T	S	0	1	S	0	2	T	0	3		
220	U	0	4	6	1	T	S	0	1	S	0	2	T	0	3		
221	U	0	4	7	1	T	S	0	1	S	0	2	T	0	3		
222	U	0	4	8	1	T	S	0	1	S	0	2	T	0	3		
223	U	0	4	9	1	T	S	0	1	S	0	2	T	0	3		
224	U	0	5	0	1	T	S	0	1	S	0	2	T	0	3		
225	U	0	5	1	1	T	S	0	1	S	0	2	T	0	3		
226	U	0	5	2	1	T	S	0	1	S	0	2	T	0	3		
227	U	0	5	3	1	T	S	0	1	S	0	2	T	0	3		
228	U	0	5	4	1	T	S	0	1	S	0	2	T	0	3		
229	U	0	5	5	1	T	S	0	1	S	0	2	T	0	3		
230	U	0	5	6	1	T	S	0	1	S	0	2	T	0	3		
231	U	0	5	7	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										
				(1) PROCESS CODES (Enter code)										
232	U 0 5 8	1	T	S	0	1	S	0	2	T	0	3		
233	U 0 5 9	1	T	S	0	1	S	0	2	T	0	3		
234	U 0 6 0	1	T	S	0	1	S	0	2	T	0	3		
235	U 0 6 1	1	T	S	0	1	S	0	2	T	0	3		
236	U 0 6 2	1	T	S	0	1	S	0	2	T	0	3		
237	U 0 6 3	1	T	S	0	1	S	0	2	T	0	3		
238	U 0 6 4	1	T	S	0	1	S	0	2	T	0	3		
239	U 0 6 6	1	T	S	0	1	S	0	2	T	0	3		
240	U 0 6 7	1	T	S	0	1	S	0	2	T	0	3		
241	U 0 6 8	1	T	S	0	1	S	0	2	T	0	3		
242	U 0 6 9	1	T	S	0	1	S	0	2	T	0	3		
243	U 0 7 0	1	T	S	0	1	S	0	2	T	0	3		
244	U 0 7 1	1	T	S	0	1	S	0	2	T	0	3		
245	U 0 7 2	1	T	S	0	1	S	0	2	T	0	3		
246	U 0 7 3	1	T	S	0	1	S	0	2	T	0	3		
247	U 0 7 4	1	T	S	0	1	S	0	2	T	0	3		
	U 0 7 5	1	T	S	0	1	S	0	2	T	0	3		
	U 0 7 6	1	T	S	0	1	S	0	2	T	0	3		
250	U 0 7 7	1	T	S	0	1	S	0	2	T	0	3		
251	U 0 7 8	1	T	S	0	1	S	0	2	T	0	3		
252	U 0 7 9	1	T	S	0	1	S	0	2	T	0	3		
253	U 0 8 0	50	T	S	0	1	S	0	2	T	0	3		
254	U 0 8 1	1	T	S	0	1	S	0	2	T	0	3		
255	U 0 8 2	1	T	S	0	1	S	0	2	T	0	3		
256	U 0 8 3	1	T	S	0	1	S	0	2	T	0	3		
257	U 0 8 4	1	T	S	0	1	S	0	2	T	0	3		
258	U 0 8 5	1	T	S	0	1	S	0	2	T	0	3		
259	U 0 8 6	1	T	S	0	1	S	0	2	T	0	3		
260	U 0 8 7	1	T	S	0	1	S	0	2	T	0	3		
261	U 0 8 8	1	T	S	0	1	S	0	2	T	0	3		
262	U 0 8 9	1	T	S	0	1	S	0	2	T	0	3		
263	U 0 9 0	1	T	S	0	1	S	0	2	T	0	3		
264	U 0 9 1	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
							(1) PROCESS CODES (Enter code)										
	S	0	1	S	0	2	T	0	3								
265	U	0	9	2	1	T	S	0	1	S	0	2	T	0	3		
266	U	0	9	3	1	T	S	0	1	S	0	2	T	0	3		
267	U	0	9	4	1	T	S	0	1	S	0	2	T	0	3		
268	U	0	9	5	1	T	S	0	1	S	0	2	T	0	3		
269	U	0	9	6	1	T	S	0	1	S	0	2	T	0	3		
270	U	0	9	7	1	T	S	0	1	S	0	2	T	0	3		
271	U	0	9	8	1	T	S	0	1	S	0	2	T	0	3		
272	U	0	9	9	1	T	S	0	1	S	0	2	T	0	3		
273	U	1	0	1	1	T	S	0	1	S	0	2	T	0	3		
274	U	1	0	2	1	T	S	0	1	S	0	2	T	0	3		
275	U	1	0	3	1	T	S	0	1	S	0	2	T	0	3		
276	U	1	0	5	1	T	S	0	1	S	0	2	T	0	3		
277	U	1	0	6	1	T	S	0	1	S	0	2	T	0	3		
278	U	1	0	7	1	T	S	0	1	S	0	2	T	0	3		
279	U	1	0	8	1	T	S	0	1	S	0	2	T	0	3		
280	U	1	0	9	1	T	S	0	1	S	0	2	T	0	3		
281	U	1	1	0	1	T	S	0	1	S	0	2	T	0	3		
282	U	1	1	1	1	T	S	0	1	S	0	2	T	0	3		
283	U	1	1	2	1	T	S	0	1	S	0	2	T	0	3		
284	U	1	1	3	1	T	S	0	1	S	0	2	T	0	3		
285	U	1	1	4	1	T	S	0	1	S	0	2	T	0	3		
286	U	1	1	5	1	T	S	0	1	S	0	2	T	0	3		
287	U	1	1	6	1	T	S	0	1	S	0	2	T	0	3		
288	U	1	1	7	1	T	S	0	1	S	0	2	T	0	3		
289	U	1	1	8	1	T	S	0	1	S	0	2	T	0	3		
290	U	1	1	9	1	T	S	0	1	S	0	2	T	0	3		
291	U	1	2	0	1	T	S	0	1	S	0	2	T	0	3		
292	U	1	2	1	1	T	S	0	1	S	0	2	T	0	3		
293	U	1	2	2	1	T	S	0	1	S	0	2	T	0	3		
294	U	1	2	3	1	T	S	0	1	S	0	2	T	0	3		
295	U	1	2	4	1	T	S	0	1	S	0	2	T	0	3		
296	U	1	2	5	1	T	S	0	1	S	0	2	T	0	3		
297	U	1	2	6	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES									
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))					
298	U	1	2	7	1	T	S	0	1	S	0	2	T	0	3	
299	U	1	2	8	1	T	S	0	1	S	0	2	T	0	3	
300	U	1	2	9	1	T	S	0	1	S	0	2	T	0	3	
301	U	1	3	0	1	T	S	0	1	S	0	2	T	0	3	
302	U	1	3	1	1	T	S	0	1	S	0	2	T	0	3	
303	U	1	3	2	1	T	S	0	1	S	0	2	T	0	3	
304	U	1	3	3	1	T	S	0	1	S	0	2	T	0	3	
305	U	1	3	4	1	T	S	0	1	S	0	2	T	0	3	
306	U	1	3	5	1	T	S	0	1	S	0	2	T	0	3	
307	U	1	3	6	1	T	S	0	1	S	0	2	T	0	3	
308	U	1	3	7	1	T	S	0	1	S	0	2	T	0	3	
309	U	1	3	8	1	T	S	0	1	S	0	2	T	0	3	
310	U	1	4	0	1	T	S	0	1	S	0	2	T	0	3	
311	U	1	4	1	1	T	S	0	1	S	0	2	T	0	3	
312	U	1	4	2	1	T	S	0	1	S	0	2	T	0	3	
313	U	1	4	3	1	T	S	0	1	S	0	2	T	0	3	
	U	1	4	4	1	T	S	0	1	S	0	2	T	0	3	
	U	1	4	5	1	T	S	0	1	S	0	2	T	0	3	
316	U	1	4	6	1	T	S	0	1	S	0	2	T	0	3	
317	U	1	4	7	1	T	S	0	1	S	0	2	T	0	3	
318	U	1	4	8	1	T	S	0	1	S	0	2	T	0	3	
319	U	1	4	9	1	T	S	0	1	S	0	2	T	0	3	
320	U	1	5	0	1	T	S	0	1	S	0	2	T	0	3	
321	U	1	5	1	1	T	S	0	1	S	0	2	T	0	3	
322	U	1	5	2	1	T	S	0	1	S	0	2	T	0	3	
323	U	1	5	3	1	T	S	0	1	S	0	2	T	0	3	
324	U	1	5	4	100	T	S	0	1	S	0	2	T	0	3	
325	U	1	5	5	1	T	S	0	1	S	0	2	T	0	3	
326	U	1	5	6	1	T	S	0	1	S	0	2	T	0	3	
327	U	1	5	7	1	T	S	0	1	S	0	2	T	0	3	
328	U	1	5	8	1	T	S	0	1	S	0	2	T	0	3	
329	U	1	5	9	10	T	S	0	1	S	0	2	T	0	3	
330	U	1	6	0	1	T	S	0	1	S	0	2	T	0	3	

Description of Hazardous Wastes (Continued; Additional Sheet)

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES												(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																		
331	U	1	6	1	1	T	S	0	1	S	0	2	T	0	3				
332	U	1	6	2	1	T	S	0	1	S	0	2	T	0	3				
333	U	1	6	3	1	T	S	0	1	S	0	2	T	0	3				
334	U	1	6	4	1	T	S	0	1	S	0	2	T	0	3				
335	U	1	6	5	1	T	S	0	1	S	0	2	T	0	3				
336	U	1	6	6	1	T	S	0	1	S	0	2	T	0	3				
337	U	1	6	7	1	T	S	0	1	S	0	2	T	0	3				
338	U	1	6	8	1	T	S	0	1	S	0	2	T	0	3				
339	U	1	6	9	1	T	S	0	1	S	0	2	T	0	3				
340	U	1	7	0	1	T	S	0	1	S	0	2	T	0	3				
341	U	1	7	1	1	T	S	0	1	S	0	2	T	0	3				
342	U	1	7	2	1	T	S	0	1	S	0	2	T	0	3				
343	U	1	7	3	1	T	S	0	1	S	0	2	T	0	3				
344	U	1	7	4	1	T	S	0	1	S	0	2	T	0	3				
345	U	1	7	6	1	T	S	0	1	S	0	2	T	0	3				
346	U	1	7	7	1	T	S	0	1	S	0	2	T	0	3				
347	U	1	7	8	1	T	S	0	1	S	0	2	T	0	3				
348	U	1	7	9	1	T	S	0	1	S	0	2	T	0	3				
349	U	1	8	0	1	T	S	0	1	S	0	2	T	0	3				
350	U	1	8	1	1	T	S	0	1	S	0	2	T	0	3				
351	U	1	8	2	1	T	S	0	1	S	0	2	T	0	3				
352	U	1	8	3	1	T	S	0	1	S	0	2	T	0	3				
353	U	1	8	4	1	T	S	0	1	S	0	2	T	0	3				
354	U	1	8	5	1	T	S	0	1	S	0	2	T	0	3				
355	U	1	8	6	1	T	S	0	1	S	0	2	T	0	3				
356	U	1	8	7	1	T	S	0	1	S	0	2	T	0	3				
357	U	1	8	8	2	T	S	0	1	S	0	2	T	0	3				
358	U	1	8	9	1	T	S	0	1	S	0	2	T	0	3				
359	U	1	9	0	1	T	S	0	1	S	0	2	T	0	3				
360	U	1	9	1	1	T	S	0	1	S	0	2	T	0	3				
361	U	1	9	2	1	T	S	0	1	S	0	2	T	0	3				
362	U	1	9	3	1	T	S	0	1	S	0	2	T	0	3				
363	U	1	9	4	1	T	S	0	1	S	0	2	T	0	3				

Description of Hazardous Wastes (Continued; Additional Sheet)

Line number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES										(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
	(1) PROCESS CODES (Enter code)																
364	U	1	9	6	1	T	S	0	1	S	0	2	T	0	3		
365	U	1	9	7	1	T	S	0	1	S	0	2	T	0	3		
366	U	2	0	0	1	T	S	0	1	S	0	2	T	0	3		
367	U	2	0	1	1	T	S	0	1	S	0	2	T	0	3		
368	U	2	0	2	1	T	S	0	1	S	0	2	T	0	3		
369	U	2	0	3	1	T	S	0	1	S	0	2	T	0	3		
370	U	2	0	4	1	T	S	0	1								
371	U	2	0	5	1	T	S	0	1								
372	U	2	0	6	1	T	S	0	1	S	0	2	T	0	3		
373	U	2	0	7	1	T	S	0	1	S	0	2	T	0	3		
374	U	2	0	8	1	T	S	0	1	S	0	2	T	0	3		
375	U	2	0	9	1	T	S	0	1	S	0	2	T	0	3		
376	U	2	1	0	1	T	S	0	1	S	0	2	T	0	3		
377	U	2	1	1	100	T	S	0	1	S	0	2	T	0	3		
378	U	2	1	3	1	T	S	0	1	S	0	2	T	0	3		
379	U	2	1	4	1	T	S	0	1	S	0	2	T	0	3		
	U	2	1	5	1	T	S	0	1	S	0	2	T	0	3		
	U	2	1	6	1	T	S	0	1								
382	U	2	1	7	1	T	S	0	1								
383	U	2	1	8	1	T	S	0	1	S	0	2	T	0	3		
384	U	2	1	9	1	T	S	0	1	S	0	2	T	0	3		
385	U	2	2	0	100	T	S	0	1	S	0	2	T	0	3		
386	U	2	2	1	1	T	S	0	1	S	0	2	T	0	3		
387	U	2	2	2	1	T	S	0	1	S	0	2	T	0	3		
388	U	2	2	3	1	T	S	0	1	S	0	2	T	0	3		
389	U	2	2	5	1	T	S	0	1	S	0	2	T	0	3		
390	U	2	2	6	1	T	S	0	1	S	0	2	T	0	3		
391	U	2	2	7	1	T	S	0	1	S	0	2	T	0	3		
392	U	2	2	8	1	T	S	0	1	S	0	2	T	0	3		
393	U	2	3	4	1	T	S	0	1	S	0	2	T	0	3		
394	U	2	3	5	1	T	S	0	1	S	0	2	T	0	3		
395	U	2	3	6	1	T	S	0	1	S	0	2	T	0	3		
396	U	2	3	7	1	T	S	0	1	S	0	2	T	0	3		

Description of Hazardous Wastes (Continued; Additional Sheet)

Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	E. PROCESSES												(2) PROCESS DESCRIPTION (If a code is not entered in E(1))
				(1) PROCESS CODES (Enter code)												
397	U 2 3 8	1	T	S	0	1	S	0	2	T	0	3				
398	U 2 3 9	10	T	S	0	1	S	0	2	T	0	3				
399	U 2 4 0	10	T	S	0	1	S	0	2	T	0	3				
400	U 2 4 3	1	T	S	0	1	S	0	2	T	0	3				
401	U 2 4 4	1	T	S	0	1	S	0	2	T	0	3				
402	U 2 4 6	1	T	S	0	1	S	0	2	T	0	3				
403	U 2 4 7	1	T	S	0	1	S	0	2	T	0	3				
404	U 2 4 8	1	T	S	0	1	S	0	2	T	0	3				
405	U 2 4 9	1	T	S	0	1	S	0	2	T	0	3				
406	U 2 7 1	10	T	S	0	1	S	0	2	T	0	3				
407	U 2 7 8	1	T	S	0	1	S	0	2	T	0	3				
408	U 2 7 9	1	T	S	0	1	S	0	2	T	0	3				
409	U 2 8 0	1	T	S	0	1	S	0	2	T	0	3				
410	U 3 2 8	10	T	S	0	1	S	0	2	T	0	3				
411	U 3 5 3	1	T	S	0	1	S	0	2	T	0	3				
412	U 3 5 6	1	T	S	0	1	S	0	2	T	0	3				
413	U 3 6 4	1	T	S	0	1	S	0	2	T	0	3				
414	U 3 6 7	1	T	S	0	1	S	0	2	T	0	3				
415	U 3 7 2	1	T	S	0	1	S	0	2	T	0	3				
416	U 3 7 3	1	T	S	0	1	S	0	2	T	0	3				
417	U 3 8 7	1	T	S	0	1	S	0	2	T	0	3				
418	U 3 8 9	1	T	S	0	1	S	0	2	T	0	3				
419	U 3 9 4	1	T	S	0	1	S	0	2	T	0	3				
420	U 3 9 5	1	T	S	0	1	S	0	2	T	0	3				
421	U 4 0 4	1	T	S	0	1	S	0	2	T	0	3				
422	U 4 0 9	1	T	S	0	1	S	0	2	T	0	3				
423	U 4 1 0	1	T	S	0	1	S	0	2	T	0	3				
424	U 4 1 1	1	T	S	0	1	S	0	2	T	0	3				

11. Map (See instructions on page 38)**SEE ATTACHED**

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

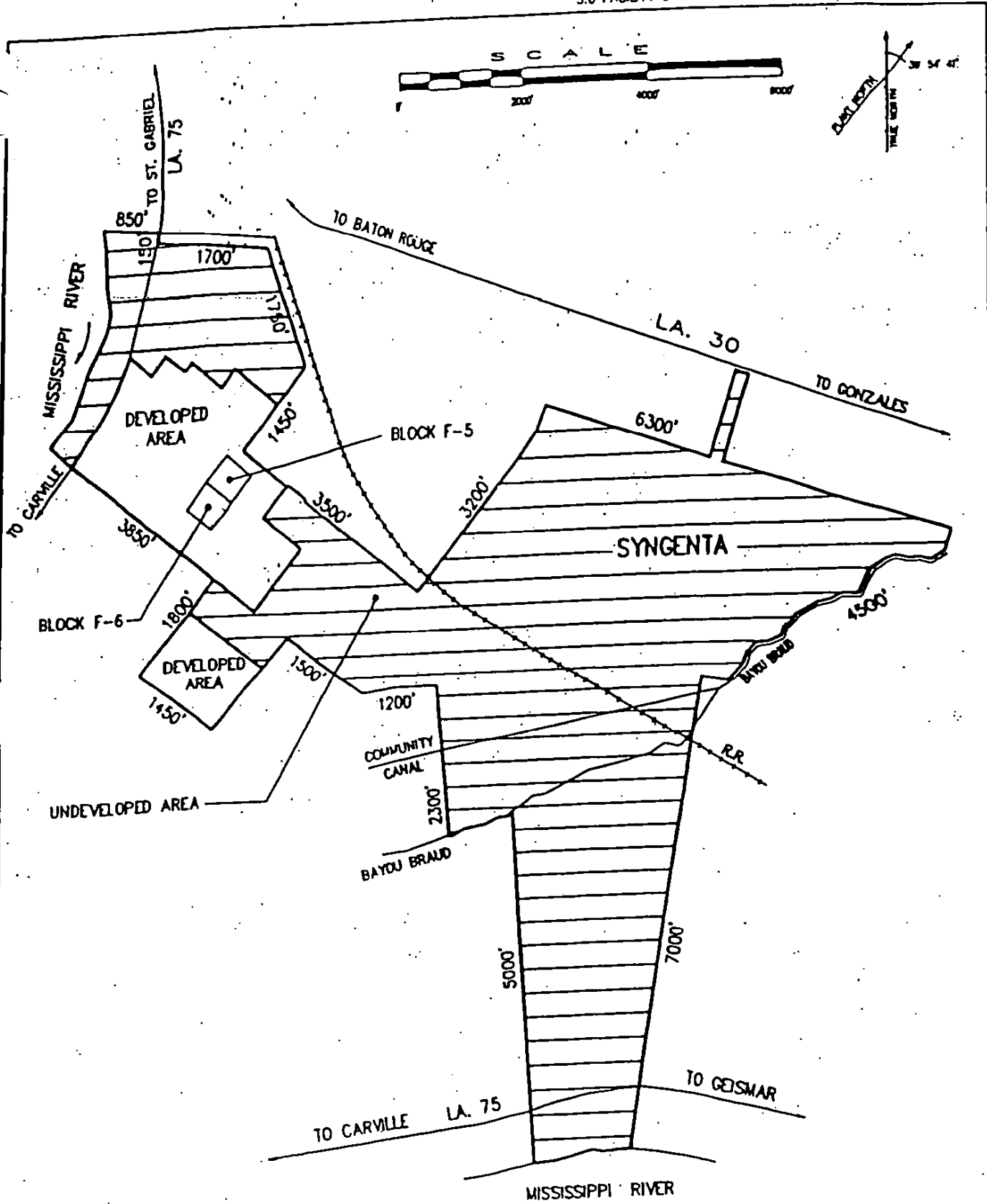
12. Facility Drawing (See instructions on page 39)**SEE ATTACHED**

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 39)**SEE ATTACHED**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

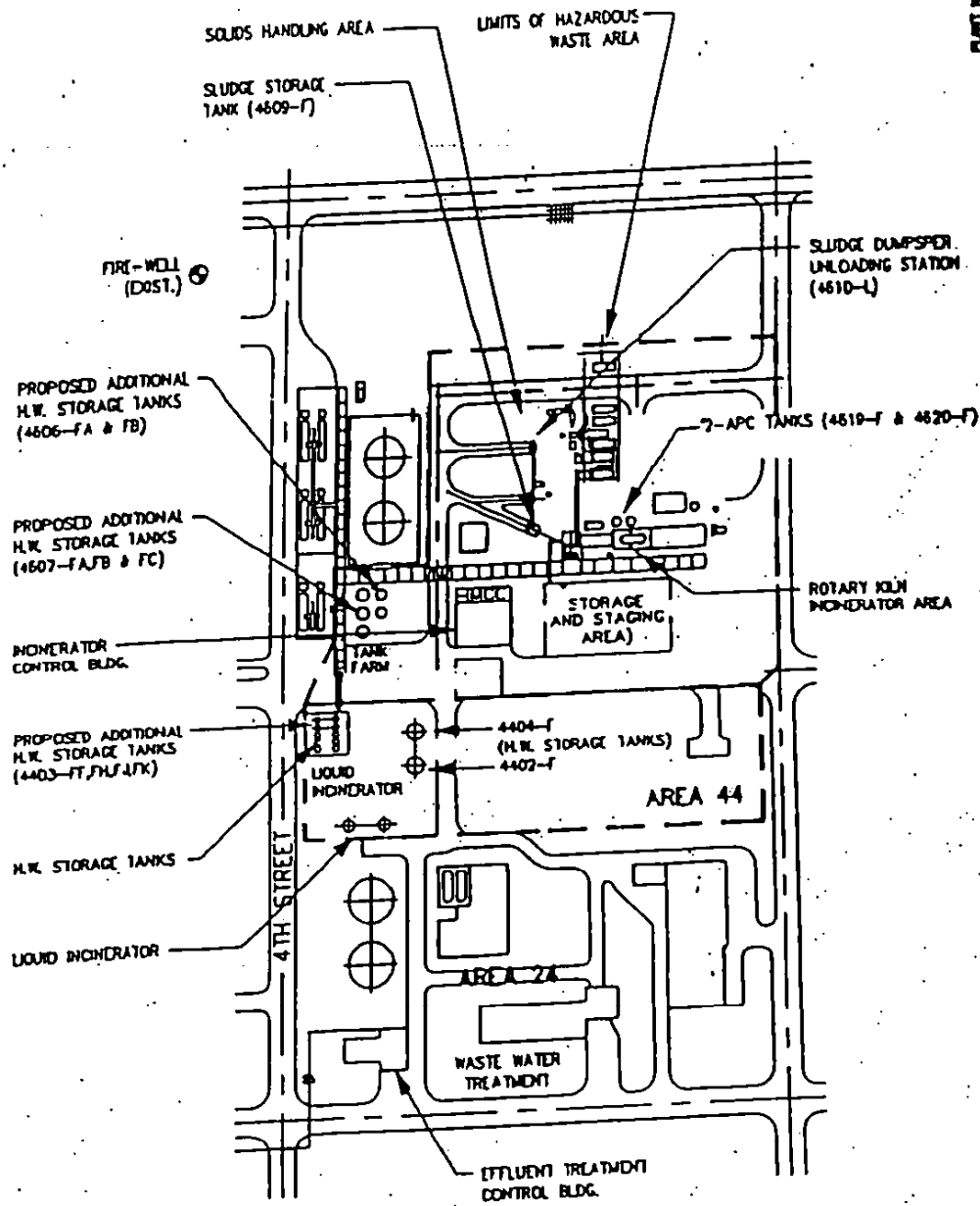
14. Comments (See instructions on page 39)



SYNGENTA

LOUISIANA

HAZARDOUS WASTE MANAGEMENT FACILITIES



STORAGE TANKS FULL CAPACITIES

EXISTING

- 4403-FA, FC, FE (24,500 GAL EA.)
- 4402-F (18,500 GAL.)
- 4403-FB, FC, FD (23,500 GAL EA.)
- 4404-F (16,000 GAL.)
- 4604-F (3,000 GAL.)
- 4609-F (34,500 GAL.)
- 70-F (3,500 GAL.)
- 9-F (3,500 GAL.)

PLANNED ADDITIONAL TANKS

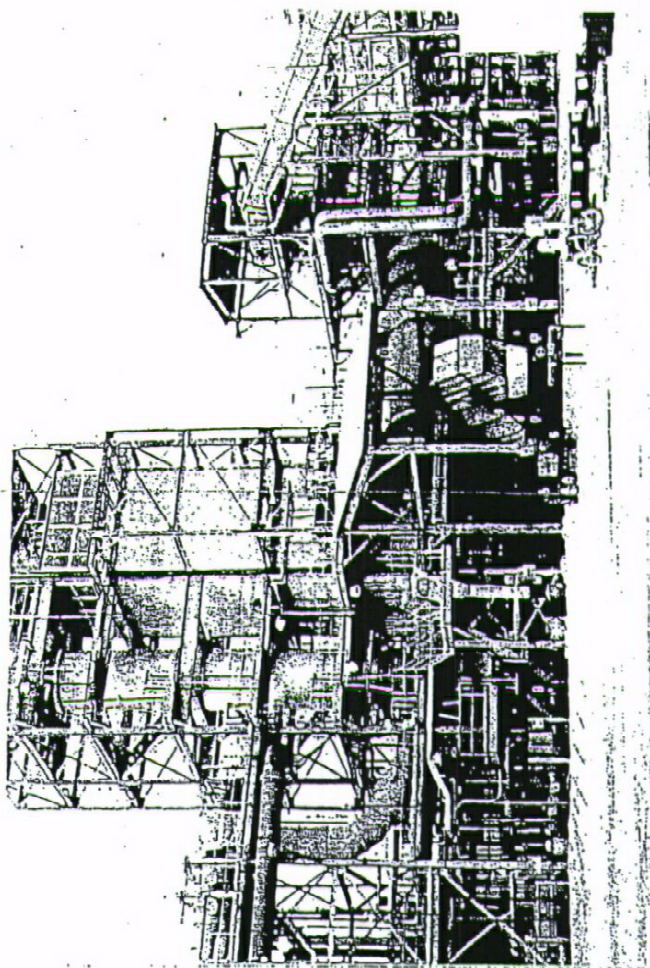
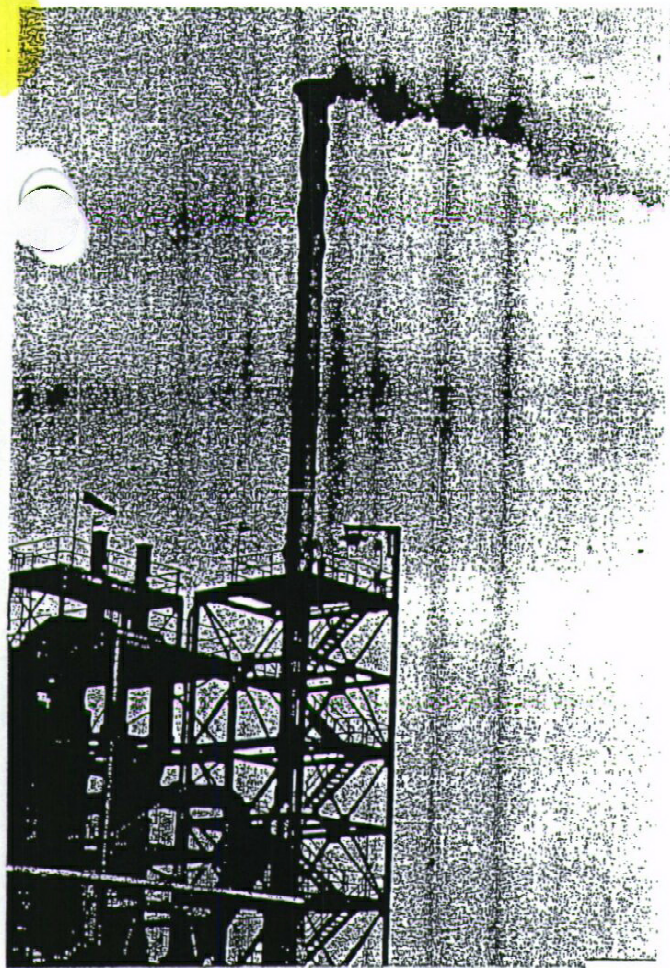
- 4403-FF, FH, J, FX (24,500 GAL EA.)
- 4406-FA, FB (10,000 GAL.)
- 4607-FA, FB, FC (15,000 GAL EA.)

SYNGENTA

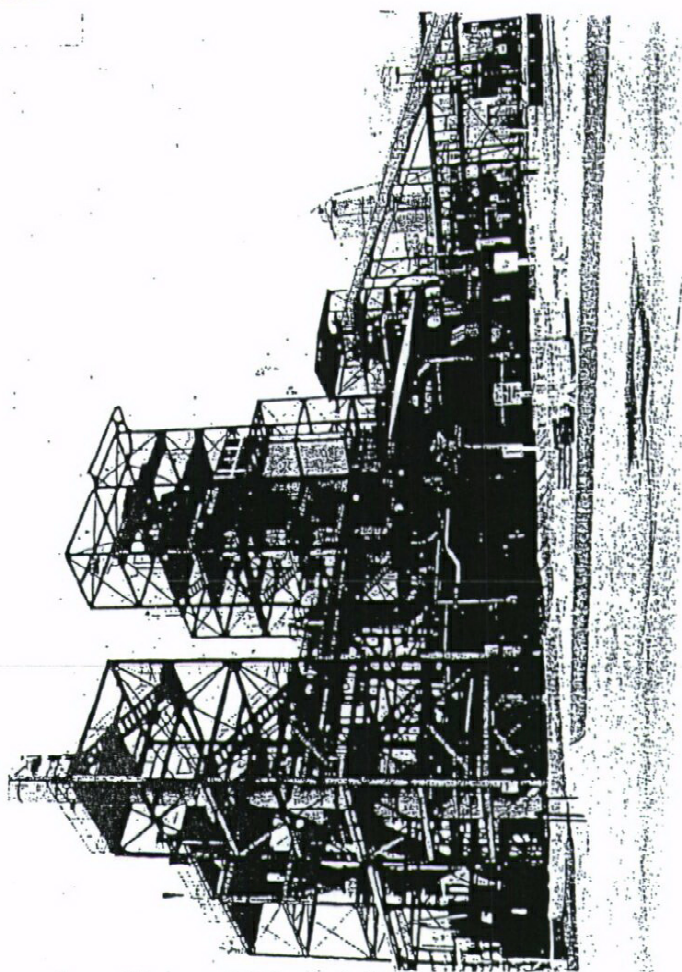
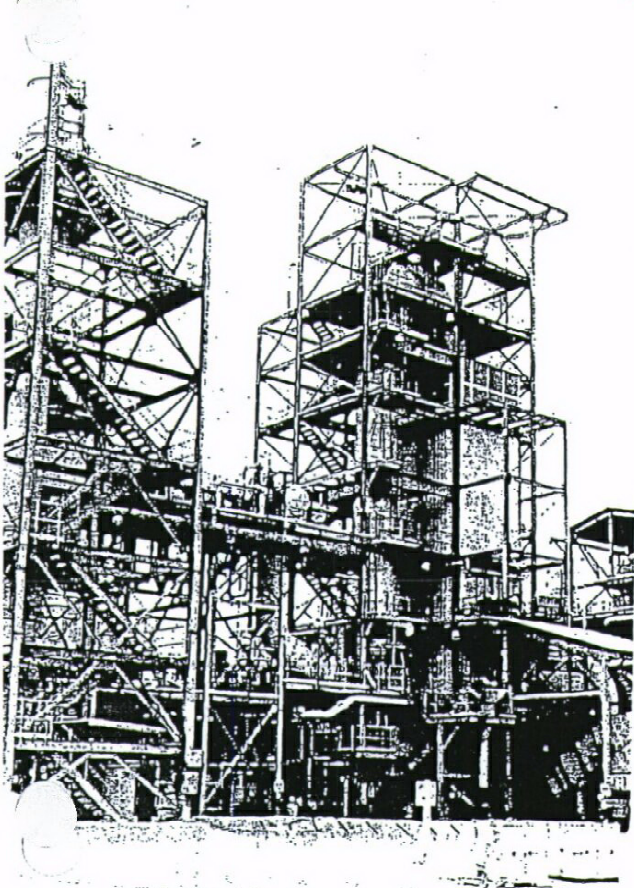
LOUISIANA

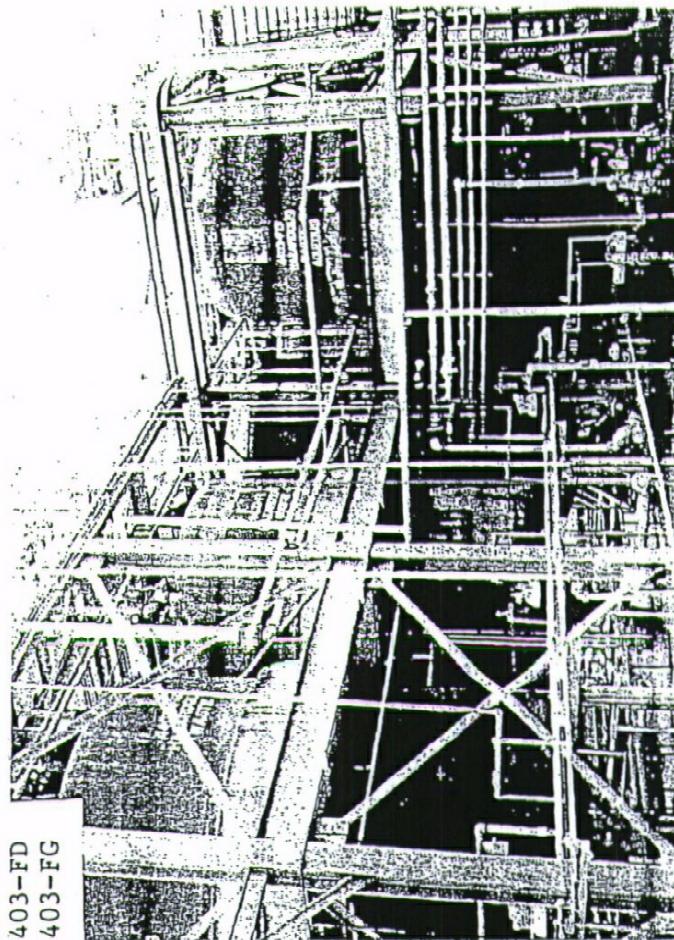
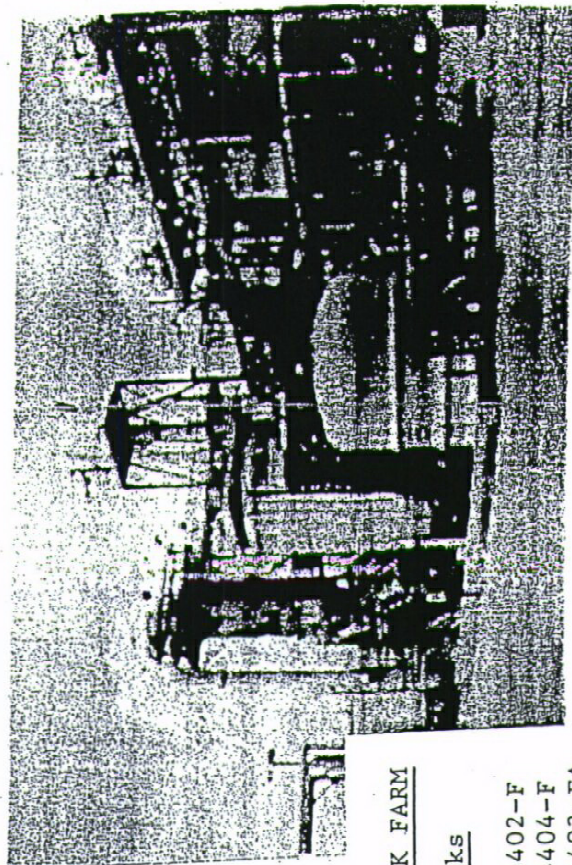
13. PHOTOGRAPHS

The photographs of the facilities were previously submitted to LDEQ on April 11, 1995, and again utilized in a March 4, 1996 resubmittal. The facilities have not changed since the April 11, 1995 submittal except for replacement of 4402-F storage tank with an above ground stainless steel tank. An updated picture of 4402-F was taken in August 2004 and included herein. Copies of the photographs are being submitted with this updated Part A Hazardous Waste Permit Application.



Multi-Purpose
Incinerator

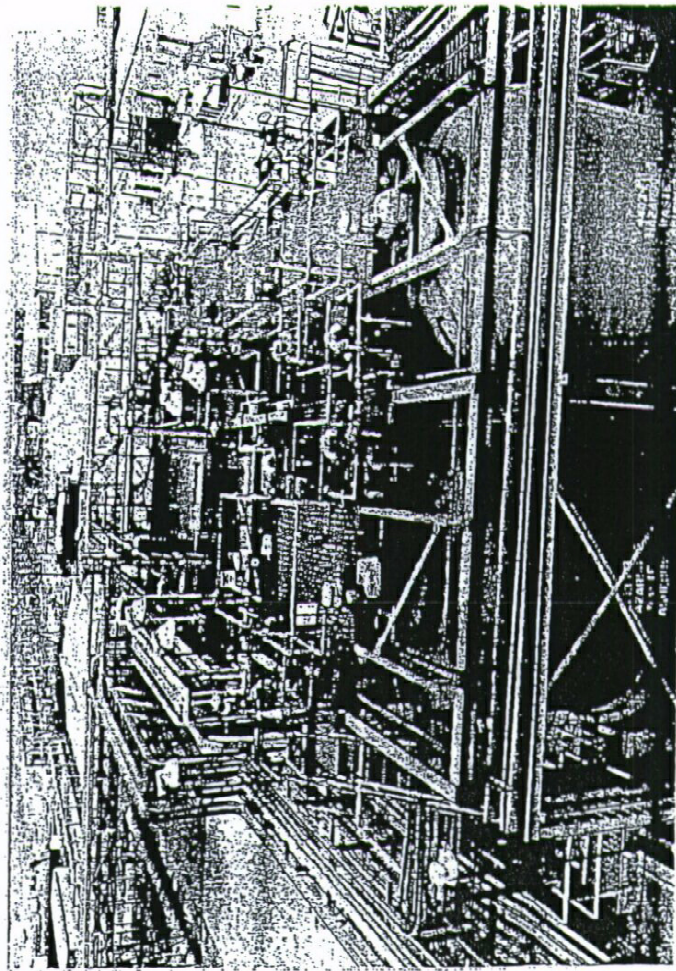
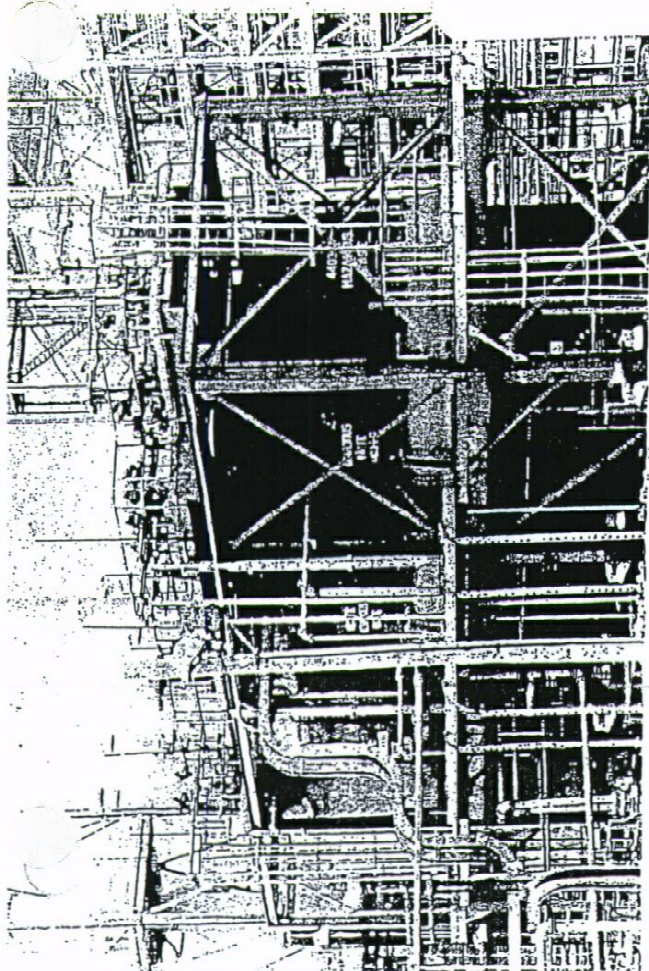


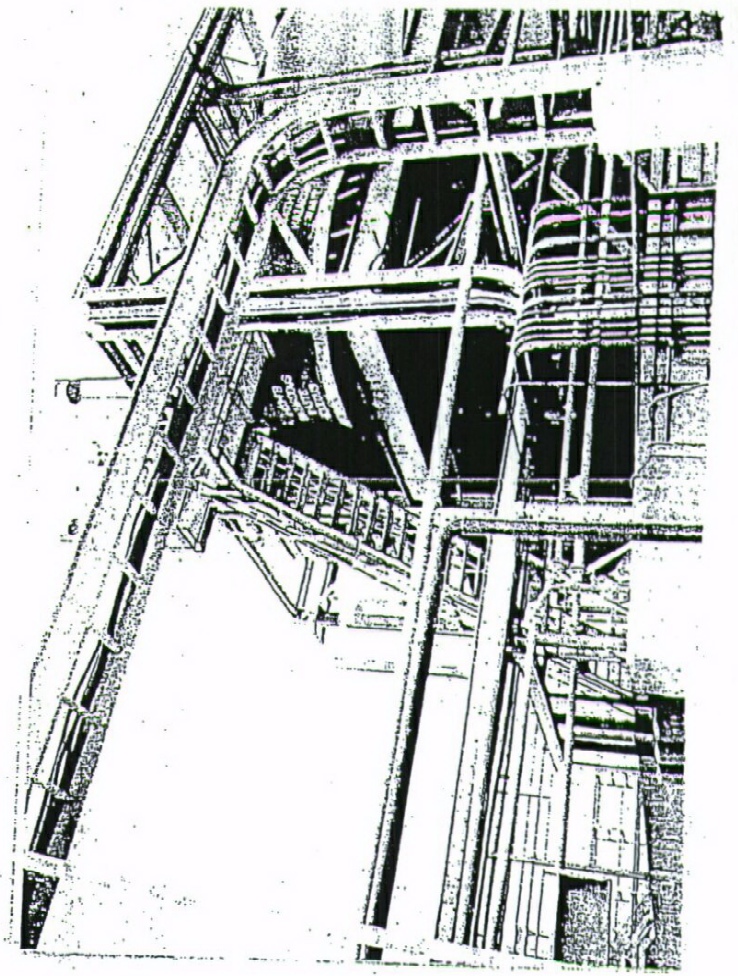


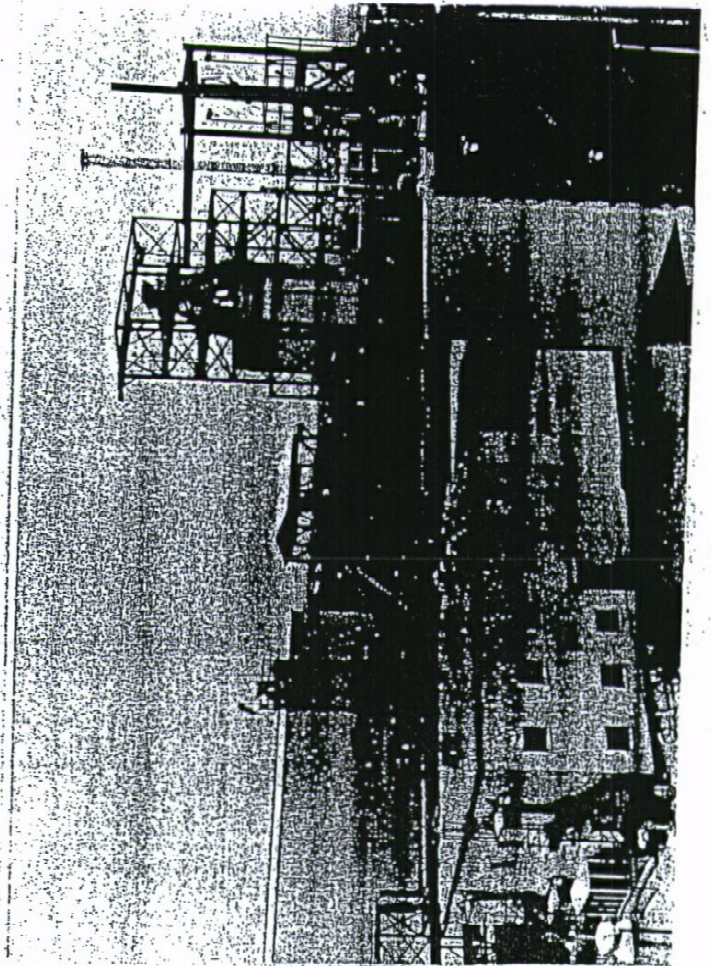
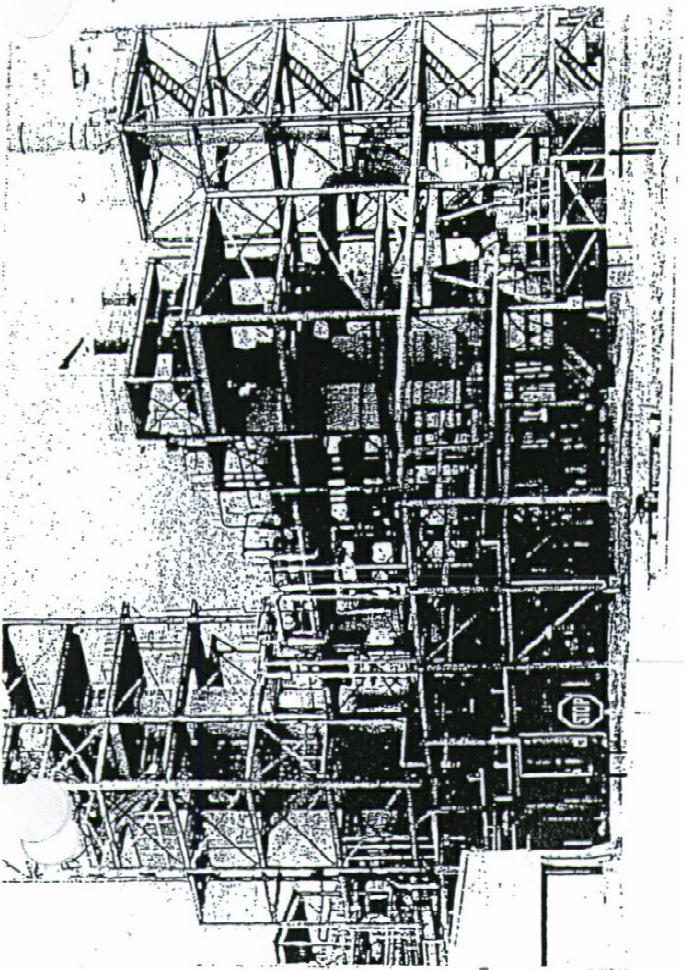
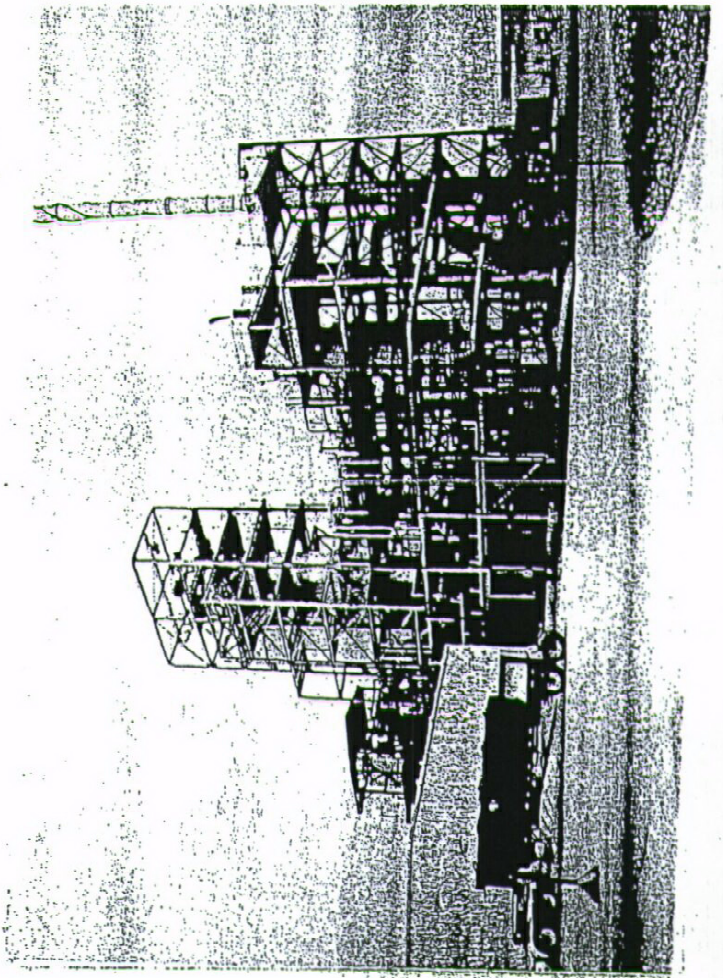
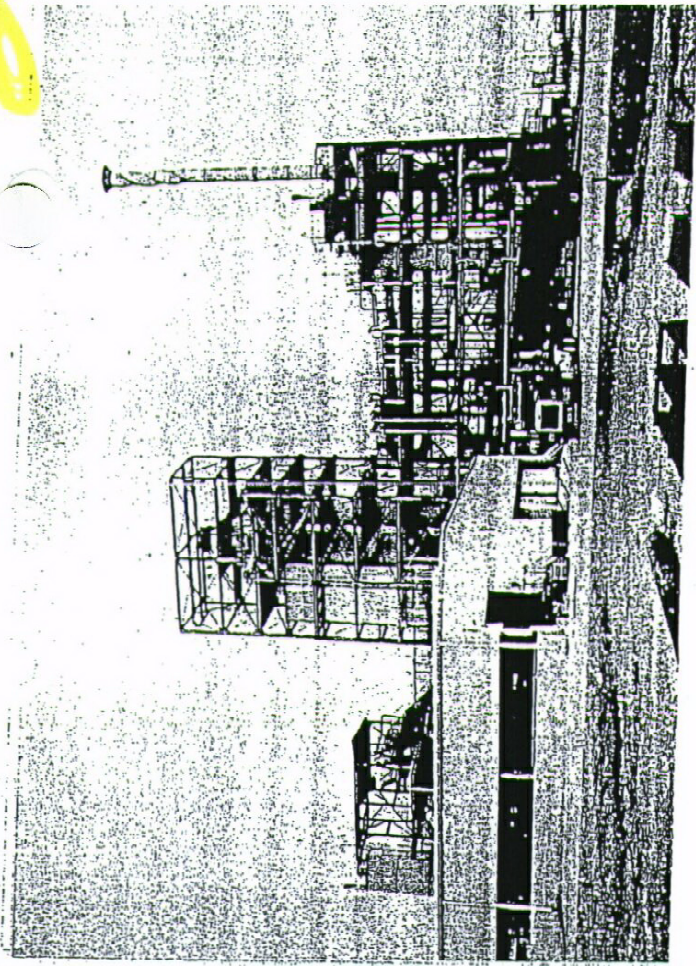
TANK FARM

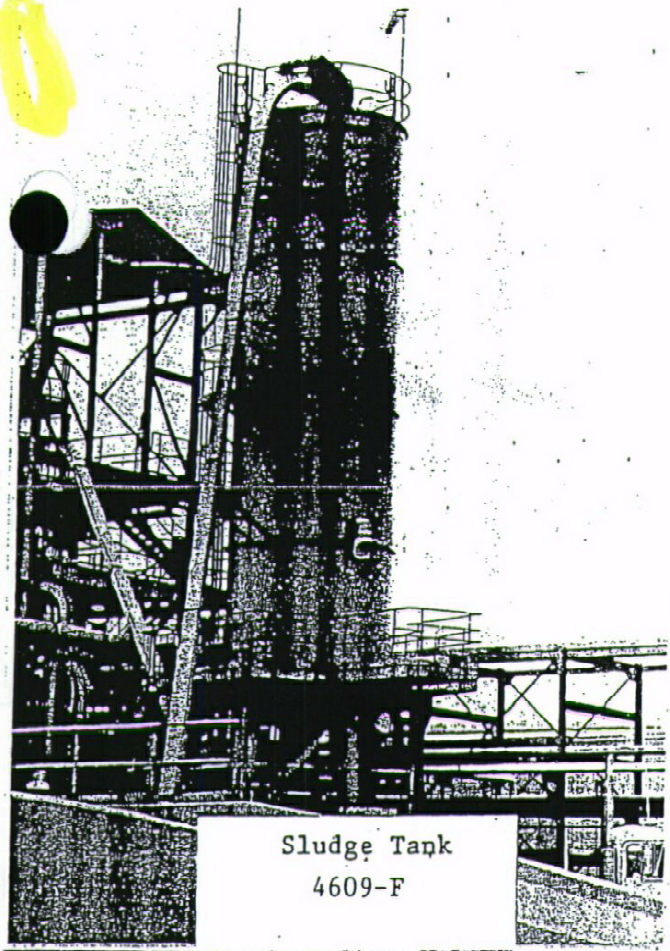
Tanks

4402-F
4404-F
4403-FA
4403-FE
4403-FB
4403-FC
4403-FD
4403-FG

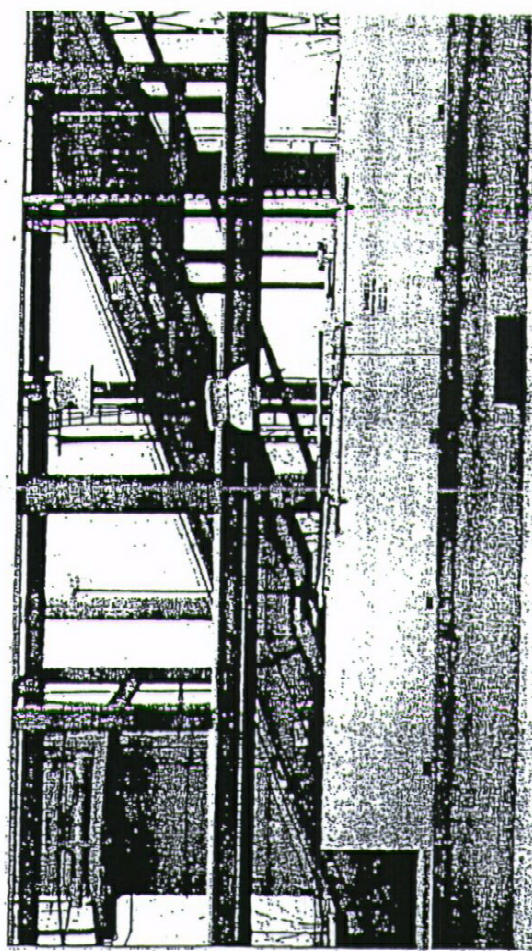




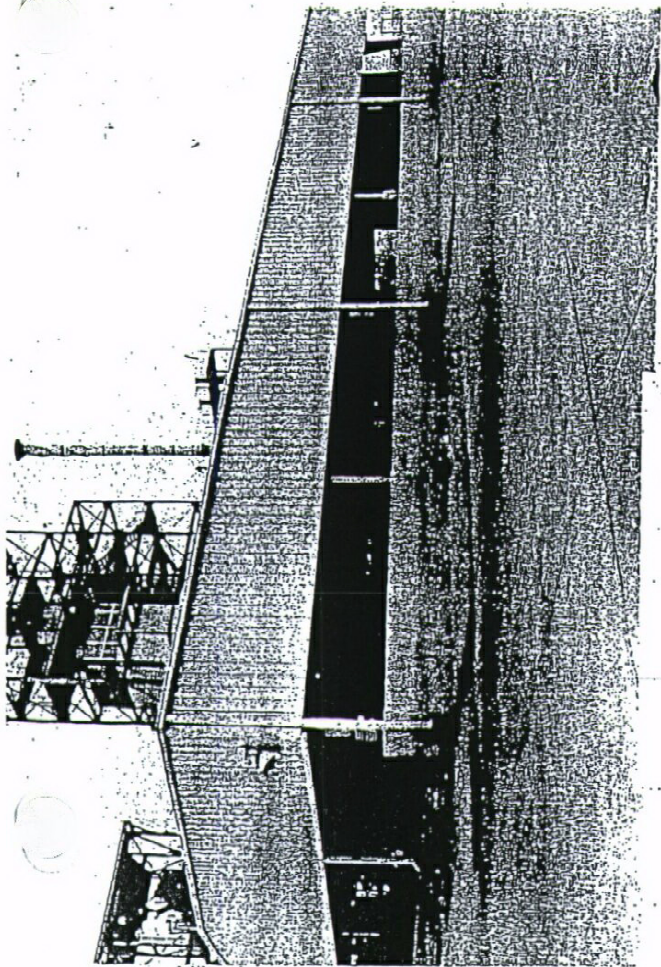




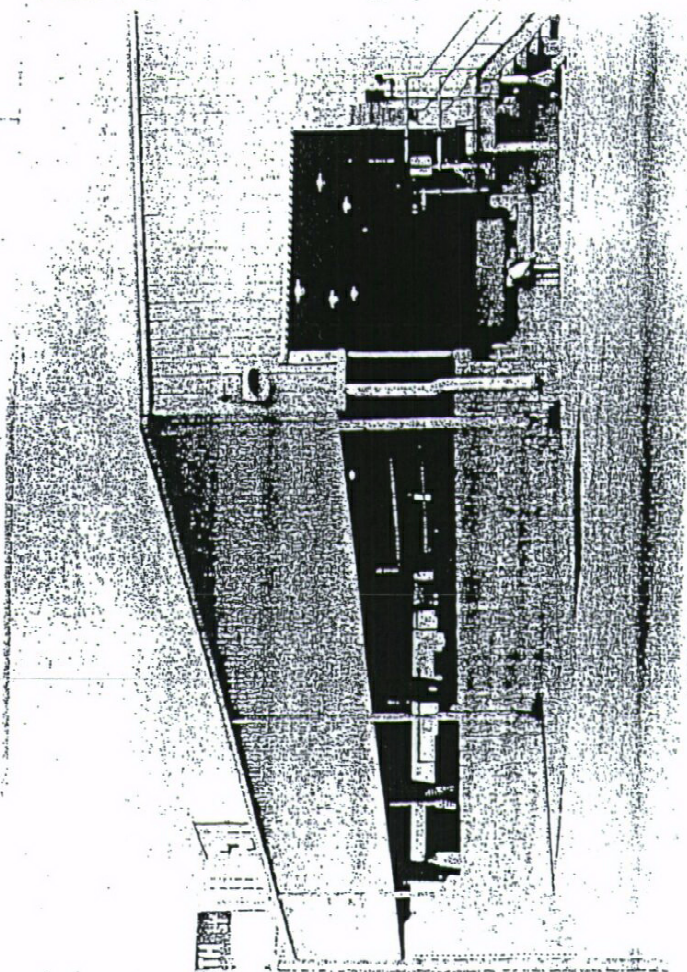
Sludge Tank
4609-F

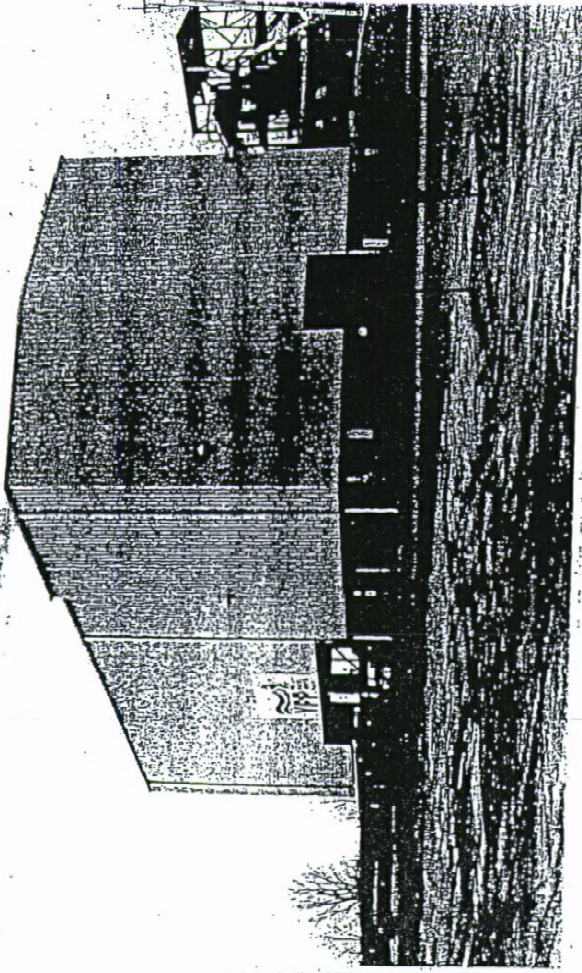


Bulk Solid/Sludge Storage
4604-F

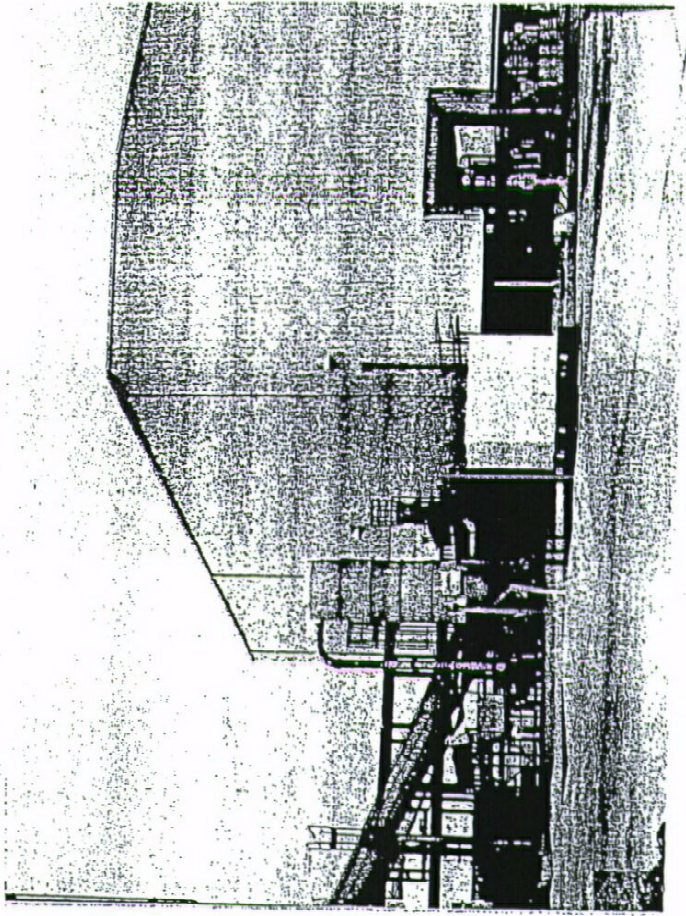
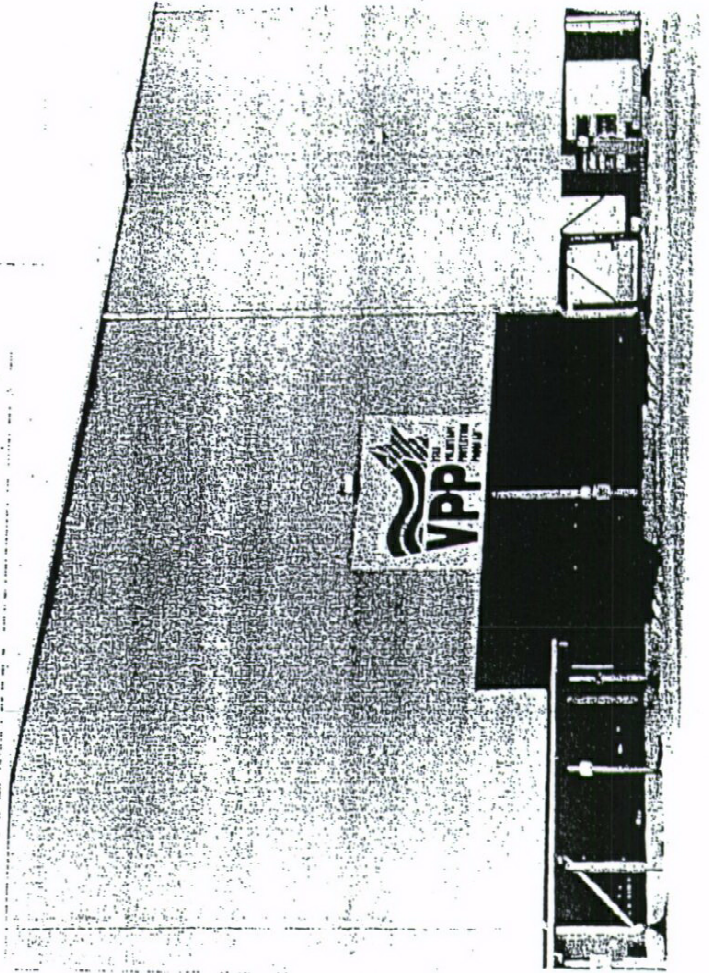


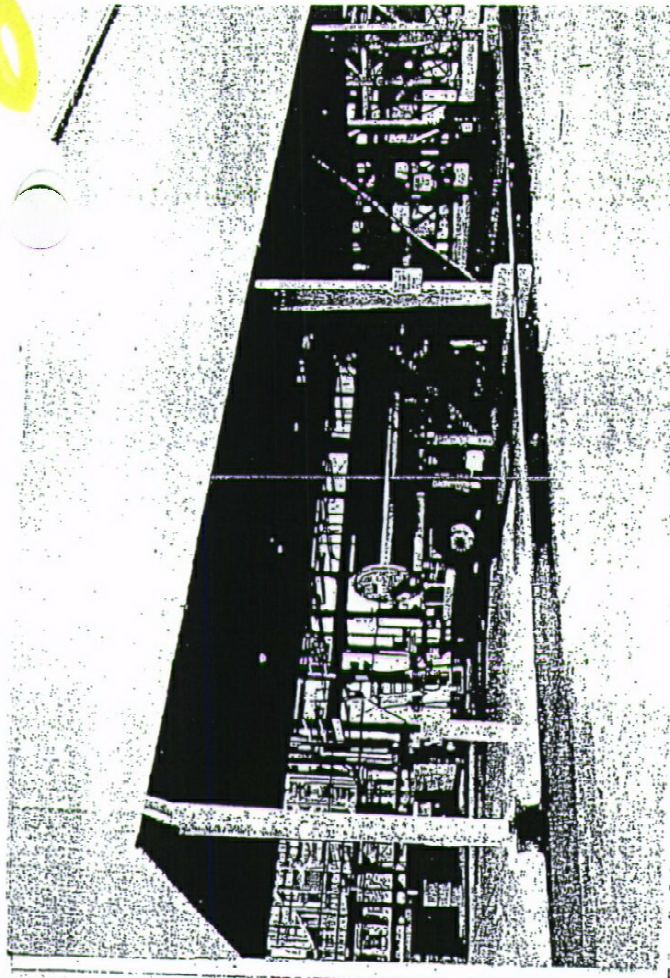
Container Storage Area



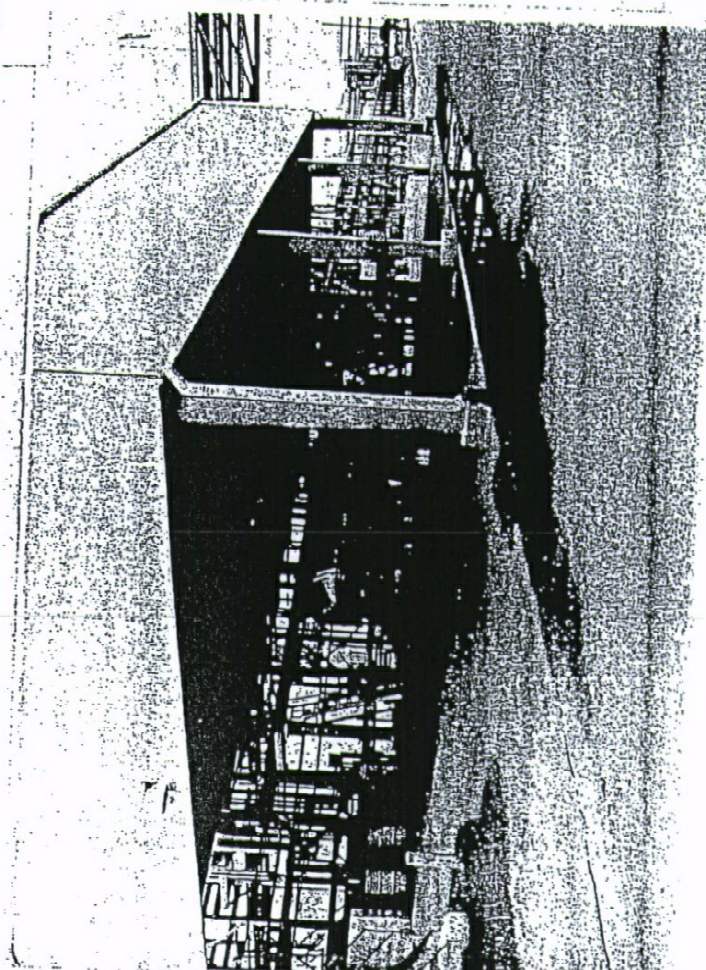
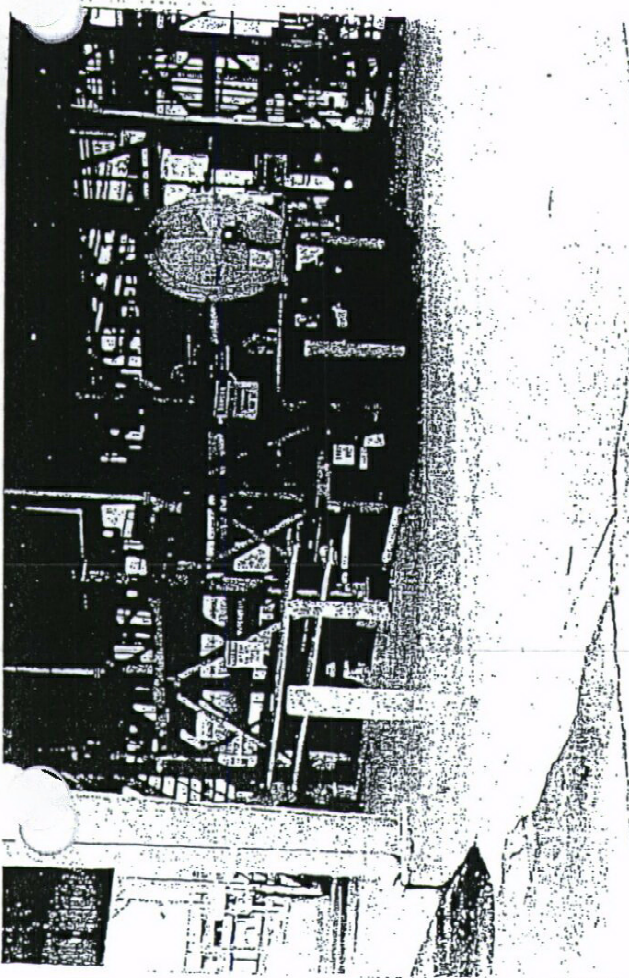
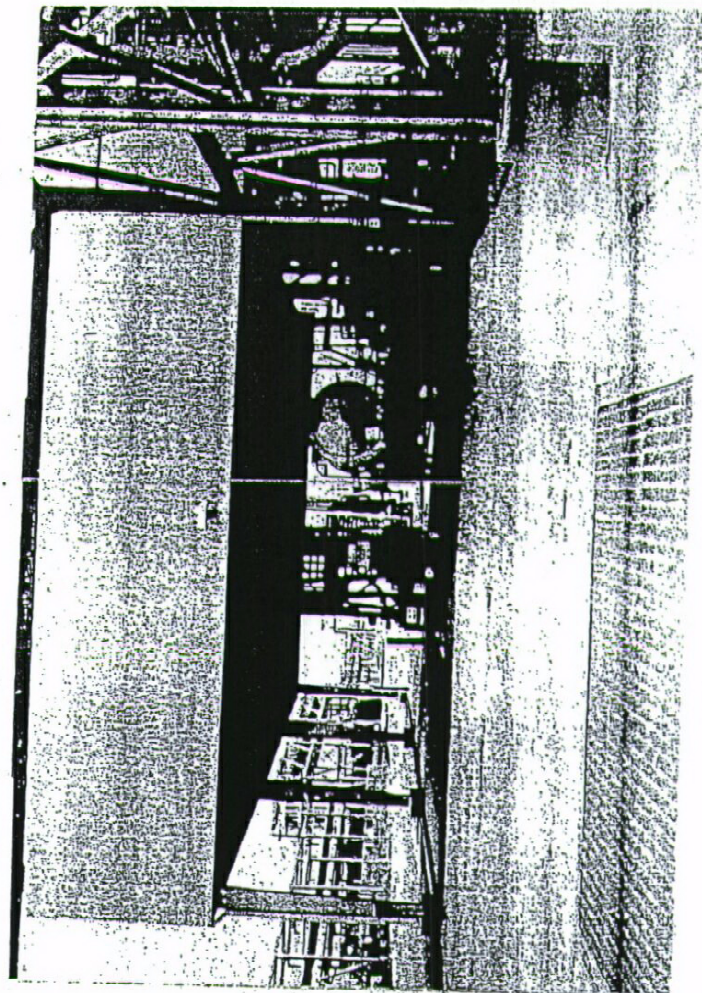


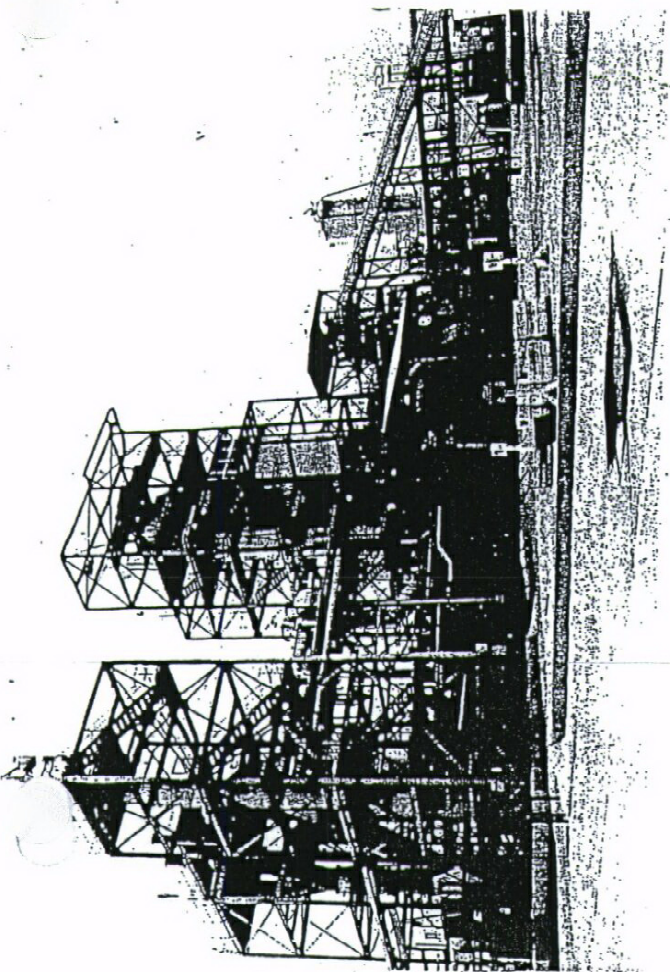
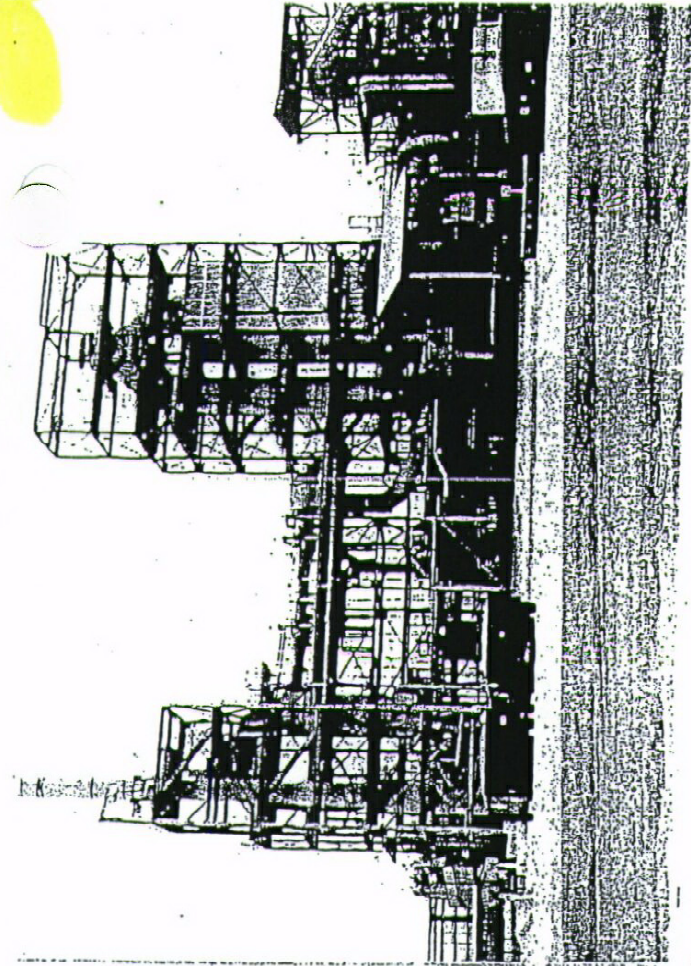
Solids Shredding Facility



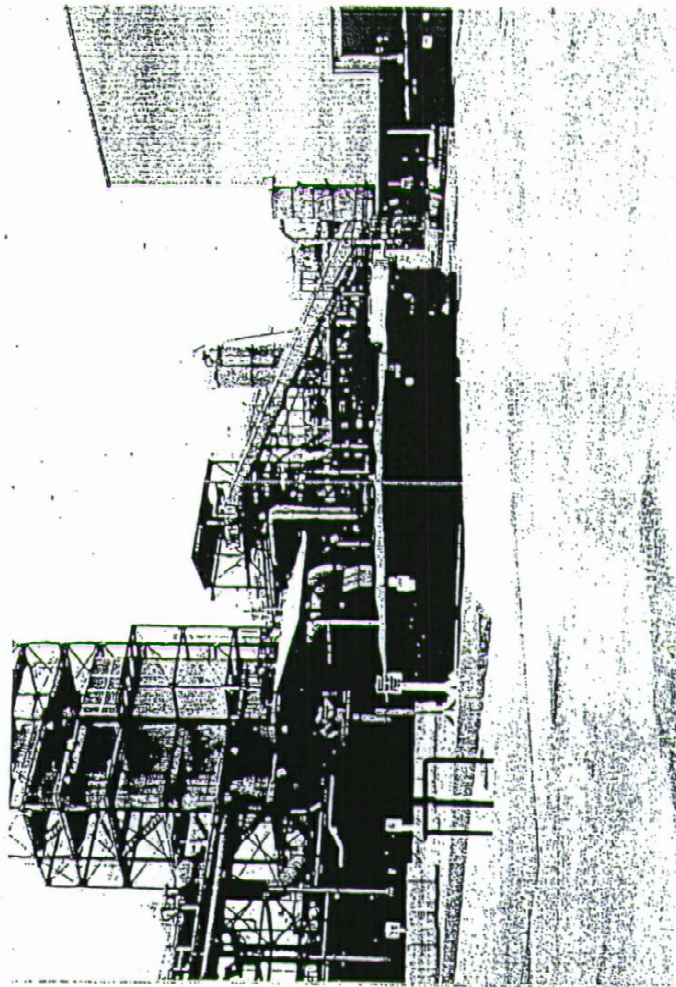


Truck Unloading Area





Ash/Waste
Staging Area



Department of Environmental Quality
Permits Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
(225) 765-0219

Addendum to Permit Applications per LAC 33:I.1701



Please Type Or Print	Company Name	
	Syngenta Crop Protection, Inc.*	
	Parent Company (if Company Name given above is a division)	
	Plant name (if any)	
	St. Gabriel Plant Site	
	Nearest town	Parish where located
	St. Gabriel	Iberville

Use attachments to provide the required information. "NA" is not an acceptable answer. If a particular section does not apply to you, explain why.

1. Please provide a list of the states where you as applicant* have federal or state environmental permits identical to, or of a similar nature to, the permit for which you are applying.

*This requirement applies to all individuals, partnerships, corporations, or other entities who own a controlling interest of 50% or more in your company, or who participate in the environmental management of the facility for an entity applying for the permit or an ownership interest in the permit.

2. Do you owe any outstanding fees or final penalties to the Department? If so, please explain.
3. Under the laws of the state of Louisiana, are you required to register with the Secretary of State? If required to do so, are you registered with the Secretary of State? Please provide proof of registration.

Certification:

I certify, under provisions in Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information contained in this Addendum to the Permit Application, including all attachments thereto are true, accurate, and complete.

Responsible Official	
Name	Robert W. Slaven
Title	St. Gabriel Plant Site Manager
Company	Syngenta Crop Protection, Inc.
Office, mail drop, or division	
Post Office Box 11	

City	State	Zip
St. Gabriel	LA	70776
Business phone		
(225) 642-1200		
Signature of responsible official(s)		
<i>Robert W. Slaven</i>		
Date	12/19/03	
01/25/01	4/08/04	

The Department may require the submission of additional information if it deems such information necessary.

The formation date of Syngenta Crop Protection, Inc. was January 1, 2001.

SYNGENTA CROP PROTECTION, INC.

ST. GABRIEL PLANT SITE

AGENCY INTEREST # 2367

LAD053783445-MO-1

ADDENDUM TO PERMIT APPLICATIONS PER

LAC 33:1.1701

Item #1

States Where Syngenta Crop Protection, Inc. Have RCRA Part A Permits

- Alabama
- California
- Florida
- Illinois
- Louisiana
- Mississippi
- Nebraska
- New York
- North Carolina
- Texas

States Where Syngenta Crop Protection, Inc. Have RCRA Part B Permits:

- Louisiana
- North Carolina
- Texas

Item #2

Outstanding Fees or Penalties

Based on our current knowledge, Syngenta Crop Protection, Inc. does not owe any outstanding fees or final penalties to the Louisiana Department of Environmental Quality (LDEQ).

Item #3

Registration With Secretary of State

Attached is a copy of the Certificate of Registration with the Secretary of the State of Louisiana for Syngenta Crop Protection, Inc.

UNITED STATES OF AMERICA
State of Louisiana

Box McKeithen

SECRETARY OF STATE

Is Secretary of State of the State of Louisiana. I do hereby Certify that

an Amended Application for Certificate of Authority form of

NOVARTIS CROP PROTECTION, INC.

Domiciled at WILMINGTON, DELAWARE, changing the corporate
name to SYNGENTA CROP PROTECTION, INC.,

Was filed and recorded in this Office on June 22, 2000.

*Testimony whereof I have hitherto set
in hand and caused the Seal of my Office
to be affixed at the City of Baton Rouge on.*

June 22, 2000

Box McKeithen

BBE 34555617F 34956496

Secretary of State



REPORTS

UPDATED AUTHORIZATION TO SIGN

REPORTS REQUIRED BY PERMIT

All reports required by the Hazardous Waste Permit and other information requested by the Administrative Authority shall be signed by the individuals occupying either of the following positions:

- Site Regulatory Lead
- Environmental Regulatory Affairs Sr. Staff Engineer/Staff Engineer

All Hazardous Waste Permit Applications and Modifications will continue to be signed and certified by the St. Gabriel Plant Site Manager

Authorization for reports by:



Robert Slaven
St. Gabriel Plant Site Manager

Date: 9/8/04

PUBLIC PARTICIPATION

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LIST OF ATTACHMENTS

ATTACHMENT 1

LIST OF FACILITY DOCUMENTS
INCORPORATED IN THE PERMIT BY
REFERENCE

**BODY
OF
PERMIT**

**FINAL
MODIFIED OPERATING PERMIT**

Syngenta Crop Protection, Inc.

**EPA ID# LAD 053 783 445
Agency Interest# 2367
PER20070027**

**Iberville Parish
St. Gabriel, Louisiana**

Permit Number LAD053783445-RN-OP-1-MO-1

I. PERMIT PREAMBLE

This Permit is issued to Syngenta Crop Protection, Inc., hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder and by the U.S. Environmental Protection Agency (USEPA) under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to Resource Conservation and Recovery Act (RCRA).

For the purposes of the Permit, "administrative authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This Permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be constructed and operated as specified in the application.

This Permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulation adopted thereunder.

All definitions contained in this Permit shall have the meaning as defined in Louisiana Administrative Code (LAC 33:V.Subpart 1) unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of issuance of this Permit. New and/or amended regulations are not included as Permit requirements until Permit modification procedures as specified in Section II.C. of the Permit are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

The Permittee is allowed to store, treat, or dispose of hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 942 U.S.C. 9606 (a).

Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorized any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation of modification of this permit. The Permittee must inform the administrative authority of any deviation from, changes in, or inaccuracies in the information in the permit application.

The administrative authority may also suspend, modify, revoke and reissue, or terminate permit for cause or when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The administrative authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulation, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the administrative authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the administrative authority, within a reasonable time, any information which the administrative authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the administrative authority upon request, copies of records required by this permit.

II.E.8. Inspection and Entry

The Permittee shall allow the administrative authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- II.E.8.a.** enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- II.E.8.b.** have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- II.E.8.c.** inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and
- II.E.8.d.** sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the administrative authority any substances or parameters at any location.

II.E.9. Sample Monitoring

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan as listed in Attachment 1, "List of Facility Documents Incorporated In The Permit By Reference".

II.E.9.b. Records of monitoring information shall include:

II.E.9.b.(1) the date, exact place, and time of sampling or measurements;

II.E.9.b.(2) the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;

II.E.9.b.(3) the date(s) analyses were performed;

II.E.9.b.(4) the name(s) and signature(s) of the individual(s) who performed the analysis;

II.E.9.b.(5) the analytical techniques or methods used;

II.E.9.b.(6) the results of such analyses; and

II.E.9.b.(7) associated quality assurance performance data.

II.E.10. Retention of Records

The Permittee shall maintain records from all ground water monitoring wells and associated ground water surface elevations for the active life of the facility and for the post-closure care period in accordance with LAC 33:V.309.J.2.

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All

records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the facility, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the administrative authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:B.309.L.1.

II.E.12. Physical Facility after Modification or Construction

No new unit, or existing unit which will undergo a major modification may be used to treat, store, or dispose hazardous waste until the unit is complete and:

II.E.12.a. the Permittee has submitted to the administrative authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. the administrative authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the Permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the administrative authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, 1531 and other requirements if necessary.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:I.3901, et seq. ("Notification Regulation and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended.) This report shall include the following:

II.E.16.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.16.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.16.b.(1) name, address, and telephone number of the owner or operator;

II.E.16.b.(2) name, address, and telephone number of the facility;

II.E.16.b.(3) date, time, and type of incident;

II.E.16.b.(4) name and quantity of materials involved;

II.E.16.b.(5) the extent of injuries, if any;

II.E.16.b.(6) an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.16.b.(7) estimated quantity and disposition of recovered material that resulted from the incident.

II.E.17. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I. 3901, "Notification Regulations and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended, the report shall be submitted in accordance with those regulations. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee shall submit a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.18. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Section II.E.16. above.

II.E.19. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the administrative authority, the Permittee shall promptly submit such facts or information.

II.E.20. Signatory Requirement

All applications, reports or other information submitted to the administrative authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.21. Schedule of Compliance

- II.E.21.a.** The Permittee shall demonstrate compliance with the air emission standards and limitations in 40 CFR Part 63, Subpart EEE by conducting a comprehensive performance test and submitting a Notification of Compliance (NOC) to the Louisiana Department of Environmental Quality, Office of Environmental Services, Permits Division.
- II.E.21.b.** The Permittee shall, at the same time of the comprehensive performance test to demonstrate compliance with 40 CFR Part 63, Subpart EEE, perform a risk trial burn to evaluate indirect risk under 40 CFR 270.32(b)(2), the omnibus authority.
- II.E.21.c.** The Permittee shall, upon completion of the performance test, risk trial burn and submittal of the Notification of Compliance (NOC), request a modification of both the RCRA and Title V permits based upon the test results.
- II.E.21.d.** The Permittee shall, upon completion of the risk trial burn and submittal of the trial burn report, which is due within 90 days after completion of the trial burn, notify the Environmental Protection Agency, Region 6 and request an indirect risk assessment based upon the risk trial burn report.
- II.E.21.e.** The Permittee shall within 90 days of issuance of this permit initiate closure of the Liquid Incinerator that has not been operated since the request for the modification of this permit in April 2001.
- II.E.21.f.** The Permittee shall within 60 days after permit becomes effective submit a Security Plan to the Office of Environmental Services, Permits Division, for review and approval.

II.E.22. Additional Operating Standards

(RESERVED)

II.E.23. Documents To Be Submitted

- II.E.23.a.** The Permittee shall submit, if not within the past two (2) years, an updated tank certification report for the existing tanks in Table 4 in accordance with LAC 33:V.1903.B

within six (6) months of the effective date of this permit. The Permittee must also include any raw data with the report.

- II.E.23.b.** The Permittee shall submit a tank certification report for new/proposed tanks in Table 6 prior to operation in accordance to LAC 33:V.1905.G. The Permittee must also include any raw data with the report.

II.E.24. Documents To Be Maintained at Facility Site

- II.E.24.a.** The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.24.a.(1) Waste analysis plan submitted in accordance with LAC 33:V.1519 (see Attachment 1).

II.E.24.a.(2) Personnel training plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

II.E.24.a.(3) Contingency plan submitted in accordance with LAC 33:V.1513 (see Attachment 1).

II.E.24.a.(4) Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.24.a.(5) Closure plan submitted in accordance with LAC 33:V.3511 and any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.24.a.(6) Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.24.a.(7) Operating records as required by LAC 33:V.1529 and 2115.D.

II.E.24.a.(8) Inspection plan and schedules developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

II.E.24.a.(9) Security plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.24.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the administrative authority for approval.

II.E.25. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.26. Manifest

The Permittee shall report manifest discrepancies and unmanifested waste as required by LAC 33:V.309.L.8 and 9.

II.E.27. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.28. Waste Discharges

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.29. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Section IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the administrative authority in accordance with Section II.E.19 of the General Permit Conditions.

II.E.30. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Section VII).

II.E.31. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.32. Incinerator MACT Provisions

The Environmental Protection Agency (EPA) has established an interim final rule on hazardous waste combustor (HWC) emission standards. The emission standards were issued under the joint authority of the Clean Air Act and the Resource Conservation and Recovery Act. The HWC rule sets Maximum Achievable Control Technology (MACT) emission standards for hazardous waste incinerators. The emission standards and operating procedures for affected facilities are codified at 40 CFR, Part 63, Subpart EEE.

In an effort to avoid a delay of issuance of a permit, the Permittee shall operate the Multi-Purpose Rotary Kiln in accordance with the incinerator operating conditions originally set forth in the modified hazardous waste permit (dated June 1996) and specified in Section V.C of this permit. The Permittee has recently completed a Comprehensive Performance Test (CPT) in accordance with the procedures specified in 40 CFR, Part 63, Subpart EEE. The Permittee shall submit a Notification of Compliance and the results of the CPT to the Louisiana Department of Environmental Quality, Office of Environmental Assessment, Environmental Technology Division within ninety (90) days of completion of testing. The results from the testing shall be used for the purpose of determining compliance with the performance standards of 40 CFR 264.343 or 40 CFR Part 63, Subpart EEE, and for determining adequate operating conditions under 40 CFR 264.345 or 40 CFR Part 63, Subpart EEE. After the approved trial burn or other testing is completed, the unit shall be operated in accordance with the operating conditions in effect prior to the commencement of the testing. The permittee may request a permit modification or amendment pursuant to LAC 33:V.321 and 322 to incorporate the new operating conditions demonstrated by the trial burn or testing results.

The administrative authority will review the comprehensive performance test results and the Notification of Compliance to determine whether the Permittee has demonstrated compliance with the HWC MACT provisions. The administrative authority will provide written notification to the Permittee regarding the transfer of applicability of operating conditions for the incinerator from the RCRA permit to the Clean Air Act (CAA) Title V permit (Permit No. 2718-VO).

II.E.33. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Section VII of this Permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

II.E.34. Attachments and Documents Incorporated by Reference

All attachments and documents required by this Permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this Permit by reference and become an enforceable part of this Permit. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the Permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this Permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this Permit according to procedures in Section II.C of this Permit.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee shall maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. Out-of-state hazardous wastes generated from Syngenta Crop Protection (U.S.) facilities (owned, operated and managed by Syngenta Crop Protection, Inc.); wholly owned subsidiaries; affiliates, NAFTA affiliates, and associated facilities, as defined below, may be shipped to the Syngenta Crop Protection, St. Gabriel Plant for storage, treatment and disposal. The following restrictions apply to this hazardous waste:

III.A.2.a. The Permittee must bear the total cost of handling, transporting, storing, treating and disposing of all hazardous waste brought into the St. Gabriel site (LAD053783445) from off-site. Under no circumstance shall the Permittee receive compensation or other consideration for hazardous waste received at the facility.

III.A.2.b. Out-of-state hazardous waste allowed to be brought into the Syngenta St. Gabriel facility for incineration from Syngenta Corporate entities, subsidiaries and associated facilities shall be limited to 50% of the total permitted capacity of the St. Gabriel facility. A list of such facilities (as referenced in Section III.A.3 of this permit) and amounts of waste received from each facility shall be submitted to the Administrative Authority each year with the annual report.

III.A.2.c. No out-of-state hazardous waste shall be allowed to be brought into the Syngenta St. Gabriel site that is:

- generated from products that have been purchased, changed ownership or otherwise entered the stream of commerce;
- hazardous waste generated as a result of a recall by a governmental authority of a Syngenta product;

- products voluntarily recalled by Syngenta in connection with a specific product stewardship program;

except, upon prior notice and approval from the Administrative Authority.

III.A.2.d. Also allowable are: hazardous wastes generated as a result of Syngenta products going as, off-specification products, products becoming contaminated, and Syngenta materials spilled in transit or hazardous wastes otherwise generated from Syngenta materials during storage and transportation of these materials.

III.A.2.e. The following definitions apply to the Permittee:

SYNGENTA CROP PROTECTION, INC. - Facilities owned and operated in the United States under the management and name of SYNGENTA CROP PROTECTION, INC.

SUBSIDIARIES - Facilities operated and managed in the United States, which are wholly owned by SYNGENTA CROP PROTECTION, INC.

ASSOCIATED FACILITIES - These are facilities which are not owned or operated by Syngenta Crop Protection, Inc., its Subsidiaries, its Parent, Affiliates or NAFTA Affiliates ("Syngenta Entities"), but are performing a processing service for those entities (e.g., packaging, blending, refining, formulating) using material(s) owned and provided by Syngenta Entities and resulting in end products owned by Syngenta Entities. Associated facility wastes also include: hazardous wastes generated as a result of Syngenta Entities' products going out of date; off specification products; approved product recalls; products becoming contaminated, and Syngenta Entity material spilled in transit. Syngenta Entity wastes generated from Syngenta Entities' materials during storage and transportation of Syngenta Entities' materials are also included.

III.A.3. When importing hazardous waste from their NAFTA affiliates for incineration in the Multi-Purpose Rotary Kiln, the Permittee must comply with LAC 33:V.1123 (Imports of Foreign Hazardous Waste). A list denoting the amount of packaged product shipped to the NAFTA Affiliates ("Syngenta Entities"), performing a processing service for

those entities (e.g., packaging, blending, refining, formulating) using material(s) owned and provided by Syngenta Entities versus the hazardous wastes generated and imported into the State of Louisiana for management in the Multi-Purpose Rotary Kiln must be provided in the annual report.

III.B. REQUIRED NOTICE

When the Permittee is to receive hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste to be shipped by the generator. The Permittee must keep a copy of this written notice as part of the operating record as required by LAC 33:V.1527.E.

III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan (Attachment 1) and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the administrative authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.

III.C.2. In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit annually, a certified statement indicating that any commercial laboratory providing analytical results and test data to the Department must be accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I.Subpart 3, Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

III.C.2.a In accordance with LAC 33:I.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;

- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by the Department regulations

This includes, but is not limited to data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

III.C.2.b If the Permittee decides to use their own "in-house" laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document and submit for approval, quality assurance/quality control procedures that commensurate with requirements in LAC 33:I.Subpart 3. Laboratory Accreditation.

III.C.2.c For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105:I and LAC 33:I Chapter 9.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and recharacterize all hazardous waste streams generated by the Permittee onsite and shipped offsite, or treated, stored or disposed onsite. The Permittee must recharacterize wastes in accordance with LAC 33:V.1519.A.3. This recharacterization shall include laboratory analyses and/or process knowledge which provide information needed to properly treat, store and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this recharacterization shall be summarized in the Permittee's Annual Report.

III.C.4. The Permittee shall submit documentation if they contract with an outside laboratory for any service required by the Waste Analysis Plan or LAC 33:V.Chapter 15. This document shall be resubmitted when a different laboratory is contracted. The Permittee shall also submit documentation that the laboratory complies with the accreditation requirements of LAC 33:I.Chapter 45.

III.C.5. The Permittee shall perform manifest verification analysis according to the Waste Analysis Plan. For each treatment or disposal method, a minimum of one (1) bulk load for each waste stream received in a 24-

hour period (except for highly reactive direct burn materials) must be sampled and analyzed as specified in the Waste Analysis Plan.

III.C.6. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

III.D. SECURITY

The Permittee shall comply with the security provisions of LAC 33:V.1507 and as specified in the Security Plan referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule referenced in Attachment 1 of this permit. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections shall be kept as required by LAC 33:V.1509.D. The inspection schedule shall include the regulatory requirements of LAC 33:V. 517.G, 1509.A, 1905, 1911, 2109, and 3119.

III.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by LAC 33:V.1515.A. This training program shall follow the outline in the training plan referenced in Attachment 1 and maintained at the facility. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee shall not place any hazardous waste unit on any portion of the property that lies within the 100 year floodplain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3.

Such site improvements shall be certified by independent licensed professional engineers and approved by LDEQ prior to any hazardous waste and/or hazardous waste facilities being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control and/or containment of run-on and run-off from the maximum rainfall occurring in 24 hours from a 25 year storm as defined by local rainfall records and LAC 33:V.1503.B.2 (when maximum rainfall records are not available, the design standard shall be 12 inches, south of 31 degrees North latitude and 9 inches north of 31 degrees North latitude where 25 year rainfall records are not available). The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b; 2111.B.4, B.5, and B.6.

III.J. HURRICANE EVENTS

The Permittee shall initiate those applicable portions of the contingency plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509, and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K 1. Required Equipment

At a minimum, the Permittee shall install and maintain the equipment set forth in the contingency plan as required by and which is in conformance with LAC 33:V.1511.C.

III.K 2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified in Section III.K.1 to insure its proper operation in time of emergency.

III.K 3. Access to Communications or Alarm Systems

The Permittee shall maintain access to the communications or alarm systems as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K 4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F and 2109.B.

III.K 5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G. have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of annual written renewal of arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the contingency plan, referenced in Attachment 1 of this permit, which complies with the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee shall comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee shall review and amend in a timely manner (if necessary), the contingency plan, as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee shall comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 9.

III.N. RECORDKEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, 1529.B, and 1529.C. and included in the permit as the Operations Plan referenced in Attachment 1.

III.N.2. Annual Report

The Permittee shall comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment, storage, and disposal facilities.

III.O. CLOSURE/POST-CLOSURE

CLOSURE

The closure plan shall include the following responses by the Permittee to LAC 33:V.1915, 3121, 3503, 3505, 3507, 3509, 3511, 3513, and 3515.

III.O.1. Closure Plan. The Permittee shall close the facility in accordance with the closure plan referenced in Attachment 1, and applicable sections of LAC 33:V.3507.

III.O.2. Amendment to Closure Plan. The Permittee shall amend the closure plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322, and 323 where applicable.

III.O.3. Notification of Closure. The Permittee shall notify the administrative authority at least 45 days prior to the date he expects to begin closure in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, and LAC 33:V.3513.

III.O.5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and dispose all facility equipment in accordance with the closure plan, and LAC 33:V.3515.

III.O.6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by LAC 33:V.3517.

III.O.7. Inventory at Closure. The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed in Table 1.

TABLE 1
(1) Existing Tanks

EXISTING TANKS	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4402-F	Organic Waste	Tank Farm Number 1	18,500 Gallons
4403-FA	Aqueous Waste	Tank Farm Number 1	24,370 Gallons
4403-FB	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FC	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FD	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FE	Organic Waste	Tank Farm Number 1	24,300 Gallons
4403-FG	Aqueous/Organic Waste	Tank Farm Number 1	24,300 Gallons
4404-F	Organic Waste	Tank Farm Number 1	16,000 Gallons
4604-FI	Bulk (solid/sludge)	Kiln Area	3,000 Gallons
4609-F	Sludge Waste	Kiln Area	34,500 Gallons
4619-F	Hydro-Recirculation	APC Area	3,500 Gallons
4620-F	Entrainment Separator/Flue Gas Residuals	APC Area	3,500 Gallons

(2) Planned Tanks

PLANNED TANK	SERVICE	LOCATION	MAXIMUM CAPACITY
4403-FF	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4403-FH	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FJ	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FK	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4606-FA	Organic Waste	Tank Farm Number 2	10,000 Gallons
4606-FB	Organic Waste	Tank Farm Number 2	10,000 Gallons
4607-FA	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FB	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FC	Aqueous Waste	Tank Farm Number 2	15,000 Gallons

(3) Existing Container Storage

CONTAINER STORAGE	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
Covered Warehouse	Covered Storage Area Number 2	Rotary Kiln Area	39,000 Gallons
Truck Loading and Unloading	Truck Loading and Unloading Area	Rotary Kiln Area	12,000 Gallons
Incinerator Ash	Incinerator Ash/Waste Handling Area	Rotary Kiln Area	74,000 Gallons

(4) Multi-Purpose Rotary Kiln

INCINERATOR	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
Multi-Purpose Rotary Kiln	Solid/Slurries/Liquid Waste	Rotary Kiln Area	18.1335 Short tons/hr

Closure will include the kiln, afterburner, all gas cooling and cleaning equipment, fan, stack, and all feed and loading equipment.

In addition to the above listed units, the closure cost must include allowances for decontaminating the buildings, associated equipment and adjacent contaminated soils.

III.P. POST-CLOSURE

III.P.1. The Permittee will attempt to clean close all units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the administrative authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements in accordance with LAC 33:3519-3527, including maintenance and monitoring throughout the post-closure care period.

III.P.2. The Permittee shall amend the post-closure plan when necessary, in accordance with LAC 33:V.3523.D. Any modifications shall be subject to LAC 33:V.321.

III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of all facilities in accordance with LAC 33:V.3705 and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:V.3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive. The closure cost estimate shall be

based on the maximum permitted inventory of each facility as specified in Condition III. Table 1 of this permit.

III.Q.5. The Permittee's post-closure cost estimate of all facilities as required by LAC 33:V.3709.A shall be included in separate post-closure plans.

III.Q.6. The Permittee shall maintain and adjust the post-closure cost estimate for inflation in accordance with LAC 33:V.3709.B.

III.Q.7. The Permittee shall adjust the post-closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the post-closure plan in accordance with LAC 33:V.3709.C. The Permittee shall consider the impact of any inventory and/or process changes on the post-closure cost estimate.

III.Q.8. The post-closure cost estimate must equal the annual post-closure cost multiplied by the number of years in the post-closure period as specified in LAC 33:V.3521.A.

III.Q.9. Any closure/post-closure modifications are subject to LAC 33:V.321.

III.R. FINANCIAL ASSURANCE FOR CLOSURE UNITS

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Section III.O.7.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences for treatment, storage, and disposal facilities or a group of such facilities in accordance with LAC 33:V.3715.A.

If a surface impoundment, landfill, land treatment facility, miscellaneous disposal unit or a group of such facilities are being used to manage hazardous waste, the Permittee shall also have and maintain liability coverage for non-sudden accidental occurrences in accordance with LAC 33:V.3715.B.

III.T. INCAPACITY OF THE PERMITTEE

The Permittee shall comply with LAC 33:V.3717 whenever bankruptcy is initiated for Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee shall immediately notify the administrative authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

IV. PERMITTED FACILITIES

The following facilities are permitted to be used in hazardous waste service:

IV.A. TANKS

TABLE 2
(1) Existing Tanks

EXISTING TANKS	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4402-F	Organic Waste	Tank Farm Number 1	18,500 Gallons
4403-FA	Aqueous Waste	Tank Farm Number 1	24,370 Gallons
4403-FB	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FC	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FD	Aqueous Waste	Tank Farm Number 1	23,060 Gallons
4403-FE	Organic Waste	Tank Farm Number 1	24,300 Gallons
4403-FG	Aqueous/Organic Waste	Tank Farm Number 1	24,300 Gallons
4404-F	Organic Waste	Tank Farm Number 1	16,000 Gallons
4604-F1	Bulk (solid/sludge)	Kiln Area	3,000 Gallons
4609-F	Sludge Waste	Kiln Area	34,500 Gallons
4619-F	Hydro-Recirculation	APC Area	3,500 Gallons
4620-F	Entrainment Separator/Flue Gas Residuals	APC Area	3,500 Gallons

(2) Planned Tanks

PLANNED TANK	SERVICE	LOCATION	MAXIMUM PERMITTED CAPACITY
4403-FF	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4403-FH	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FJ	Organic Waste	Tank Farm Number 1	24,500 Gallons
4403-FK	Aqueous Waste	Tank Farm Number 1	24,500 Gallons
4606-FA	Organic Waste	Tank Farm Number 2	10,000 Gallons
4606-FB	Organic Waste	Tank Farm Number 2	10,000 Gallons
4607-FA	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FB	Aqueous Waste	Tank Farm Number 2	15,000 Gallons
4607-FC	Aqueous Waste	Tank Farm Number 2	15,000 Gallons

IV.B. CONTAINER STORAGE (3)

The container storage areas listed in Table 3 below are permitted to store hazardous waste in properly labeled and sealed containers which have been specified for this service and are compatible with the contained waste. The containers shall be stored on pallets stacked at a maximum of two (2) high and no more than four (4) large containers per tier on the pallet (more than four (4) small containers and lab packs may be stored on each pallet) and conform to LAC 33:V.2109.B. The pallets will be placed in rows with a minimum of two (2) feet of aisle space between rows.

TABLE 3
(3) Existing Container Storage

CONTAINER STORAGE	SERVICE	LOCATION	PERMITTED STORAGE AREA (ft ²)	MAXIMUM PERMITTED STORAGE VOLUME (ft ³)
Covered Warehouse	Covered Storage Area Number 2	Rotary Kiln Area	11,540	39,000 Gallons
Truck Loading and Unloading	Truck Loading and Unloading Area	Rotary Kiln Area	3,490	12,000 Gallons
Incinerator Ash	Incin. Ash/Waste Handling Area	Rotary Kiln Area	11,700	74,000 Gallons

IV.C. INCINERATOR

Multi-Purpose Rotary Kiln

The Permittee has approval to operate a rotary kiln with afterburner section and ancillary equipment that has a nominal capacity of eighty-five million, five hundred thousand (85,500,000) Btu/hr. The rotary kiln has nominal dimensions of twelve (12) feet diameter (I.D.) by forty (40) feet long and an afterburner section approximately thirty-eight (38) feet long with inside horizontal dimensions of approximately twelve (12) feet x fifteen (15) feet. The incinerator system consists of the following components or systems:

- a. Multi-Purpose Rotary Kiln (MPI)
- b. Secondary Combustion Chamber (SCC)
- c. Combustion Air Blowers
- d. Sludge Storing and Handling
- e. Solids Storage, Handling and Shredding
- f. Quench Chamber
- g. Particle Conditioner
- h. Dual Hydrosonic Scrubbers
- i. Induced Draft Fan
- j. Effluent Exhaust Stack
- k. Ash Storage Area
- l. Truck Loading and Unloading Area

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. TANKS

V.A.1. General Conditions for Existing and Planned Tanks

- V.A.1.a.** The conditions related to treatment and/or storage of hazardous waste shall be limited to those tanks listed under Permit Section IV.A, Permitted Facilities, together with all associated piping, pumps, instruments, containments, and vent controls.
- V.A.1.b.** The Permittee shall design, construct, and maintain secondary containment for all tank systems in accordance with the administrative authority and LAC 33:V.1907.
- V.A.1.c.** The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 1917, and 1919.
- V.A.1.d.** The Permittee is prohibited from storing or treating hazardous waste for more than ninety (90) days in units not identified in Permit Section IV.A, unless the activity is exempt from regulations or allowed by an Emergency Permit.
- V.A.1.e.** The Permittee shall conform, where applicable, to the appropriate sections of the most recent edition of API Codes 653 or 510, and ASME Standards for maintenance inspection, rating, repair, and alteration of all pressure vessels and tanks [atmospheric and/or low pressure storage vessels and tanks]. Such codes establish the procedures for repairing sections of tanks, nozzles or other openings and are specifically detailed in the above listed API Codes and ASTM Standards.
- V.A.1.f.** The Permittee shall manage hazardous waste in tanks according to the air emissions standards of LAC 33:V. Chapter 17, Subchapter C, except for a tank for which a certification has been submitted to the Administrative Authority, under LAC 33:V.1747.B.7, that the tank is equipped with an operating air emission controls in accordance with 40 CFR 63. Subpart DD.

V.A.1.g. The Permittee shall, upon request, identify all 90-day accumulation tanks or containers which contain or make contact with hazardous waste with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1747 to 1767.

V.A.1.h. New tanks shall not be placed in hazardous waste service until the Permittee has complied with LAC 33:V.303.I.

V.A.1.i. All tanks shall be operated within design limits as specified in Table 4, Table 5 and Table 6.

**TABLE 4
TANK DESIGN FOR EXISTING TANKS**

TANK	DESIGN CODE	MATERIALS OF CONSTRUCTION	NOMINAL BUILT WALL THICKNESS (INCHES)	MINIMUM PERMITTED WALL THICKNESS (INCHES)*	OPERATING PRESSURE (PSIG)	LININGS
4402-F	ASME VIII, Div. 1"U"	316L SS	0.250	0.125	<15	None
4403-FA	ASME Sec. VIII	C.S	0.375	0.25	<15	None
4403-FB	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FC	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FD	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FE	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4403-FG	ASTM D4097 ASME RPT-1	FRP	1.115 BTM 0.475 TOP	N/A	<1	None
4404-F	ASME	FRP	0.535 BTM 0.415 TOP	N/A	<1	None
4604-F1	ASME	C.S	0.25 SIDES 0.375 FLOOR	0.125	<1	None
4609-F	ASME	C.S	0.625 BTM 0.313 TOP	0.188	<1	None
4619-F	ASTM D4097 ASME RPT-1	FRP	0.275 BTM 0.145 TOP	N/A	<1	None
4620-F	ASTM D4097 ASME RPT-1	FRP	0.275 BTM 0.145 TOP	N/A	<1	None

* - For inspection standard refer to Section V.A.2.c.(4) of this permit

**TABLE 5
EXISTING TANKS**

TANK	SERVICE	DIMENSIONS (DI X HT)	MAXIMUM PERMITTED CAPACITY (GALLONS)	YEAR BUILT OR PLACED INTO SERVICE
4402-F	Organic Waste	12.5' X 20.5'	18,500 Gallons	2002
4403-FA	Aqueous Waste	14' X 19'	24,370 Gallons	2006
4403-FB	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FC	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FD	Aqueous Waste	14' X 19'	23,060 Gallons	1989
4403-FE	Organic Waste	14' X 19'	24,300 Gallons	1990
4403-FG	Aqueous/Organic Waste	14' X 19'	24,300 Gallons	1990
4404-F	Organic Waste	14' X 16'	16,000 Gallons	1987
4604-F1	Bulk (solid/sludge)	9'10"X13'X5'8"	3,000 Gallons	1995
4609-F	Sludge Waste	12.5' X 39'	34,500 Gallons	1993
4619-F	*Hydro-Recirculation	8' X 11'	3,500 Gallons	1997
4620-F	*Entrainment Separator/Flue Gas Residuals	8' X 11'	3,500 Gallons	1998

*Ancillary equipment - These operations are considered physical treatment under LAC 33:V.1521. They exist as components of identified tank systems and are subject to the appropriate requirements of LAC 33:V.Chapter 19.

**TABLE 6
TANK DESIGN FOR PROPOSED TANKS**

TANK	DESIGN CODE	MATERIALS OF CONSTRUCTION	NOMINAL BUILT WALL THICKNESS (INCHES)	MINIMUM PERMITTED WALL THICKNESS (INCHES)*	LININGS
4403-FF	ASME Sec. VIII	C.S	0.375	0.25	None
4403-FH	NBS-PS-1569	FRP	1.115 BTM 0.475 TOP	N/A	None
4403-FJ	ASME Sec. VIII	C.S	0.375	0.25	None
4403-FK	NBS-PS-1569	FRP	1.115 BTM 0.475 TOP	N/A	None
4606-FA	API-620	C.S	0.375	0.25	None
4606-FB	ASME	FRP	2.4375 BTM 1.25 TOP	N/A	None
4607-FA	API-620	C.S	0.375	0.25	None
4607-FB	ASME	FRP	2.4375 BTM 1.25 TOP	N/A	None

* - For inspection standard refer to Section V.A.2.c.(4) of this permit

V.A.2. Tank Maintenance, Inspection, and Testing

V.A.2.a. The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 4 and Table 6 and not exceed the listed operating conditions.

V.A.2.b. The Permittee shall maintain the minimum shell thickness of the permitted tank systems in accordance with LAC 33:V.1903, 1905, and as specified in Table 4 and Table 6.

V.A.2.c. Tank Inspection and Testing and Maintenance of Tanks:

V.A.2.c.(1) The Permittee shall inspect while the facility is in operation, all tanks, piping, valves, vent controls, and associated instrumentation at least daily to detect any exterior signs of corrosion, cracks, or leaks as required by LAC 33:V.1911. Such inspections shall be duly logged in the operating record and any equipment failures, and resulting leaks or spills that are reportable under applicable regulations (CWA, RCRA, SARA) shall be described fully in the annual report.

V.A.2.c.(2) The Permittee's results of the most recent ultrasonic or equivalent tests for existing hazardous waste storage tanks indicates they meet the requirements of the specified permitted wall thicknesses as required by the design specifications (API or ASME) under which they were built. Such information shall be updated biennially and made a part of the annual report due the year the wall thickness measurements are determined.

V.A.2.c.(3) The Permittee will conform, where applicable, to the appropriate sections of the API Code 510 (latest edition) for maintenance inspection, rating, repair, and alteration of all pressure vessels and tanks and atmospheric and/or low pressure storage vessels and tanks (Chapter XIII of the API Code). Such codes establish the procedures for repairing tank sections, nozzles or other openings and are specifically detailed in the above listed API Codes.

V.A.2.c.(4) The Permittee shall conduct shell thickness measurements either biennially (every second year) or as directed by the administrative authority in sufficient quantity to establish data for all listed above ground tanks and vessels.

- V.A.2.c.(5)** All tanks and ancillary equipment shall be provided with secondary containment that meets the requirements of LAC 33:V.1907.
- V.A.2.c.(6)** If any shell thickness measurements for areas of the tank as defined in Section V.A.2.c (2) above are less than those listed in Table 4 Table 6 and are not in compliance with the most recent edition of API Codes 653, 510, or ASME Standard, such tank or vessel shall be removed from service and emptied of hazardous waste. The tank or vessel shall be repaired or replaced in accordance with LAC 33:V.1913.F and tested as described in Section V.A.2.c.(2) (above) or equivalent, and the administrative authority notified, before service can be re-established for hazardous waste.
- V.A.2.c.(7)** Fiberglass reinforced plastic (FRP) tanks shall be taken out of service and repaired when a significant amount of fiberglass is exposed, cracks are visible, softening and swelling occurs, or when delamination is evident.
- V.A.2.c.(8)** All new/proposed tanks and ancillary equipment must be tested for tightness prior to being placed in use as required by LAC 33:V.1905 D.
- V.A.2.d.** The pollution control methods used for tanks (See Table 7) shall be inspected on a periodic basis in accordance with the latest Inspection Schedule approved by the administrative authority.
- V.A.2.d.(1)** Tanks meeting Level 1 controls shall be inspected at least once every year, in accordance with LAC 33:V.1755.C.4.
- V.A.2.d.(2)** Tanks meeting Level 2 controls shall be inspected in accordance with LAC 1755.E.3 for internal floating roofs, LAC 33:V.1755.F.3 for external floating roofs, LAC 33:V.1755.G.3 for air emission control equipment, and LAC 33:V.1755.I.4 for closed vent control systems.

V.A.2.d.(3) The Permittee shall comply with the applicable requirements under LAC 33:V. Chapter 17, Subchapter C for each tank listed in Table 7.

Table 7
Emission Controls for Tanks

Tank	Service	LAC Reference(s)	Air Emission Controls
4402-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FA	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FB	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FC	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FD	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FE	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FG	Organic/Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4404-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4604-F1	Bulk (solid/sludge)	LAC 33:V.1755.D.3	Level 2 Controls
4609-F	Sludge Waste	LAC 33:V.1755.D.3	Level 2 Controls
4619-F	Hydro-Recirculation	LAC 33:V.1755.D.3	Level 2 Controls
4620-F	Entrainment Separator/Flue Gas Residuals	LAC 33:V.1755.D.3	Level 2 Controls

V.A.3. Operation of All Tank Systems

V.A.3.a. The Permittee shall prevent spills and overflows from the tank or containment systems and prepare daily log sheets which shall be placed in the operating record as required by LAC 33:V.1909 and LAC 33:V.1911. This information shall include the following:

- V.A.3.a.(1) All monitored parameters including temperature, pressures, levels, and pump flows into and out of these tanks.
- V.A.3.a.(2) Test or inspection of overfilling controls to ensure they are in working order.
- V.A.3.a.(3) Routine inspection of levels for those tanks not having control devices.

- V.A.3.b.** The Permittee shall prepare daily log sheets to record, where applicable, the following inspection information for all tanks and related vessels as required by LAC 33:V.1911.A, such as:
- V.A.3.b.(1)** The results of the visual inspection of all tanks and associated piping, valves, fittings, instruments, and vent control and relief systems.
 - V.A.3.b.(2)** The results of the visual inspection of the containment areas for leaks, cracks, or spills as well as the dikes or containment wall for structural integrity.
- V.A.3.c.** The Permittee shall not place hazardous wastes or treatment reagents in the tank systems if they could cause the tank, its ancillary equipment, or a containment system to rupture, leak, corrode, or otherwise fail, as evidenced by frequent maintenance and repair as required by LAC 33:V.1909.A. Such evidence must be corrected as required by LAC 33:V.1913.
- V.A.3.d.** The Permittee must respond to any leaks or spills as required by LAC 33:V.1913. If any spilled material or material collected/trapped in sumps is a hazardous waste, it must be managed in accordance with LAC 33:V.1505.C.3. Permittee shall note that if the collected material is discharged through a point source to United States waters or to a Public Owned Treatment Works, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it shall be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.
- V.A.3.e.** All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.
- V.A.3.f.** The Permittee shall not store wastes which are incompatible with the tank materials of construction which would cause accelerated rates of corrosion as evidenced by frequent maintenance and repair. Such evidence must be corrected as required by LAC 33:V.1909.
- V.A.3.g.** The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information and reports (via the April 2001 Part B Permit Renewal Application and subsequent application revisions and addendums) that were submitted to and approved by the administrative authority.

- V.A.3.h.** The Permittee shall, upon request, identify all 90-day accumulation tanks or containers, which contain or make contact with hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1747 to 1767.

V.A.4. Closure

The Permittee shall, upon closure of a tank system, remove all hazardous waste and hazardous waste residues as specified in the Closure Plan (Attachment 1). The Permittee shall also remove or decontaminate all waste residues from contaminated system components, contaminated soils, and contaminated structures and equipment and manage them as hazardous waste, unless they do not meet the definition of hazardous waste, as required by LAC 33:V.1915, LAC 33:V.Chapters 35 and 37.

V.A.5. Response to Leaks And/Or Spills

- V.A.5.a.** The Permittee must assess the results of a leak test or other tank integrity examination inspection as required by LAC 33:V.1903.
- V.A.5.b.** The Permittee must respond to any leaks or spills as required by LAC 33:V.1913.A, B, and C.
- V.A.5.c.** Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed as a hazardous waste must be cleaned up in a timely manner as required by LAC 33:V.1505.C.3.
- V.A.5.d.** Any release to the environment from a leak or spill must be reported as required by LAC 33:V.1913.D.
- V.A.5.e.** Provisions must be made for secondary containment, repair or closure, and any necessary repair certifications, as required by LAC 33:V.1913.E and F.
- V.A.5.f.** In the event of a leak or a spill from the tank system, from a secondary containment system, or if a system becomes unfit for continued use, the Permittee shall remove the system from service immediately and complete the following actions (LAC 33:V.1913):
- V.A.5.f.(1)** Stop the flow of hazardous waste into the system and inspect the system to determine the cause of the release.
- V.A.5.f.(2)** Remove waste and accumulated precipitation from the system within 24 hours of the detection of the leak to prevent further release and to allow inspection and repair of the

system. If the Permittee finds that it will be impossible to meet this time period, the Permittee shall notify the Administrative Authority and demonstrate that the longer time period is required. If the collected material is a RCRA hazardous waste, it must be managed in accordance with all applicable requirements of LAC 33:V.1505.C.3. The Permittee shall note that if the collected material is discharged through a point source to U.S. waters to a POTW, it is subject to requirements of the Clean Water Act. If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I. Chapter 39, and 40 CFR Part 302.

V.A.5.f.(3) Contain visible releases to the environment. The Permittee shall immediately conduct a visual inspection of all releases to the environment and based on that inspection: (1) prevent further migration of the leak or spill to soils or surface water and (2) remove and properly dispose of any visible contamination of the soil or surface water.

V.A.5.f.(4) Close the system in accordance with the Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2. through E.3 are satisfied.

V.A.5.f.(4)(i) For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

V.A.5.f.(4)(ii) For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning it to service.

V.A.5.f.(4)(iii) For a release to the environment caused by a leak from the portion of the tank system component that is not readily available for visual inspection, the Permittee shall provide secondary containment that meets the requirements of LAC 33:V.1907.

V.A.5.f.(4)(iv) If the Permittee replaces a component of the tank system to eliminate the leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

V.A.5.f.(5) For all major repairs to eliminate leaks or restore the integrity of the tank system, in accordance with LAC 33:V.1913.F, the Permittee must obtain a certification by an independent, qualified, registered professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system before returning the system to service. Examples of major repairs are: installation of an internal liner, repair of a ruptured tank, or repair or replacement of a secondary containment vault.

V.A.6. Recordkeeping and Reporting

V.A.6.a. The Permittee shall report to the administrative authority within twenty-four (24) hours of detection, when a leak or spill occurs from the tank system or secondary containment system to the environment (LAC 33:V.1913.D).

V.A.6.b. Within thirty (30) days of detecting a release to the environment from the tank system or secondary containment system, the Permittee shall report the following information (LAC 33:V.1913.D.3) to the administrative authority:

V.A.6.b.(1) likely route of migration of the release;

V.A.6.b.(2) characteristics of the surrounding soil (including soil composition, geology, hydrogeology, and climate);

V.A.6.b.(3) results of any monitoring or sampling conducted in connection with the release. If the Permittee finds it will be impossible to meet this time schedule, the Permittee should provide the administrative authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires;

V.A.6.b.(4) proximity of downgradient drinking water, surface water, and populated areas; and

V.A.6.b.(5) description of response actions taken or planned.

V.A.6.c. The Permittee shall submit to the administrative authority all certifications of major repairs to correct leaks within seven (7) days from returning the tank system to use (LAC 33:V.1913.F and LAC 33:V.513).

V.A.6.d. The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation and testing of new tank systems. (LAC 33:V.1905.A, C, D, E, F, and LAC 33:V.513).

V.A.6.e. The Permittee shall keep on file at the facility the written assessment of the existing tank system's integrity (LAC 33:V.1903 and 513).

V.A.6.f. The Permittee must maintain records that meet LAC 33:V.1765.B requirements for tanks using air emission control devices.

V.A.7. Post-Closure

The Permittee will attempt to clean close all tank system units. If the facility cannot be clean closed, the Permittee shall present a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. CONTAINER STORAGE

The permit conditions as set forth under this section shall apply where applicable, to the permitted container storage facilities as designated in Section IV.B.

V.B.1. The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.

V.B.2. The Permittee shall maintain all containers in accordance with LAC 33:V.2103.

V.B.3. The Permittee will assure the integrity of the containers in accordance with LAC 33:V.2105.

V.B.4. The Permittee must manage the containers in accordance with LAC 33:V.2107.A and B.

V.B.5. The Permittee must inspect the containers and containment areas in accordance with LAC 33:V.2109.A, B, C and LAC 33:V.1509. Results of such inspections must be placed in the operating log. All incidents involving leaking containers and spilled materials reportable under applicable regulations (CWA, RCRA, SARA) shall be detailed in the annual report.

- V.B.6.** The Permittee must maintain the containment storage area as required by LAC 33:V.2111.A, B.1, 2 and 3.
- V.B.7.** The Permittee must manage spilled or leaked waste and accumulated precipitation according to LAC 33:V.2111.B.5.
- V.B.8.** The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Storm water shall be contained until analysis establishes that it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal methods.
- V.B.9.** The Permittee must place and store incompatible, ignitable, and reactive waste only in accordance with LAC 33:V.2115.A, B, C, D and LAC 33:V.1517.
- V.B.10.** The Permittee shall store hazardous waste (where applicable) on pallets not more than two (2) containers high and no more than four (4) large containers per tier on the pallet (more than four (4) small containers and lab packs may be stored on each pallet) and conform to LAC 33:V.2109.B. The pallets will be placed in rows with a minimum two (2) feet of aisle space between rows.
- V.B.11.** The Permittee must maintain those records and documents required by LAC 33:V.1513 and 1529 for the implementation of the contingency plan for this container storage area.
- V.B.12.** The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.
- V.B.13.** The Permittee must control and report all point source discharges according to LAC 33:V.1505.
- V.B.14.** All trucks containing hazardous waste shall be managed only in areas designed and utilized for managing such vehicles. These areas must meet the requirements of LAC 33:V.1527 and LAC 33:V.2111.
- V.B.15.** Spilled or leaked waste shall be removed in a timely manner as required by LAC 33:V.2111.B.5.
- V.B.16.** A representative sample of the hazardous waste in the tank truck must be analyzed in accordance with the Waste Analysis Plan to verify pertinent information on the manifest.
- V.B.17.** The quantity of waste received must be recorded and chemical and physical characteristics identified with regard to ignitability, reactivity, and incompatibility as required by LAC 33:V.2113 and 2115.

- V.B.18.** All solid hazardous waste shall be stored separate from the liquid hazardous waste or clearly designated as solid hazardous waste. Liquid containment capacity shall be readily determined by visual inspection.
- V.B.19.** The Permittee shall not exceed the maximum liquid capacity listed under Part IV, Section B, of this permit for each container storage area listed.
- V.B.20.** At closure, the Permittee must remove all hazardous waste, residues, and containers from the container storage area. All containers and liners must be handled as a hazardous waste (unless meeting the definition of empty). All residuals and contaminated soils must be removed as required by the Closure Plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117. If the facility cannot be clean closed, the Permittee shall present a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.
- V.B.21.** The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.
- V.B.22.** The Permittee shall comply with the applicable requirements under LAC 33:V.1747 to 1767 for each container/container storage area listed in Table 8.
- V.B.23.** The pollution control methods used for containers shall be inspected on a periodic basis as listed in Inspection Plan referenced in Attachment 1 of this permit.
- V.B.23.a.** Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.
- V.B.23.b.** Level 2 controls shall be inspected in accordance with LAC 33:V.1759.D.4.
- V.B.23.c.** Level 3 controls shall be inspected in accordance with LAC 33:V.1759.E.4.
- V.B.24.** Container storage areas using Level 3 controls must meet LAC 33:V.1765.D requirements.

Table 8
Emission Controls for Containers

Container/Container Storage Area Identification	LAC Reference(s)	Air Emission Controls
Covered Warehouse	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Truck Loading and Unloading Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Incinerator Ash Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls

V.C. INCINERATOR

The Multipurpose Rotary Kiln Incinerator is subject to the Permittee's Clean Air Act Title V Permit 2718-V2, issued July 19, 2007 and any revisions made to the Title V Permit 2718-V2. In addition, the Permittee must abide by 40 CFR 63 Subpart EEE and the provisions listed below.

V.C.1. Permitted and Prohibited Wastes

- V.C.1.a.** The Permittee may burn, in the Multi-Purpose Rotary Kiln unit, only the hazardous wastes within the limits listed in this permit (See the Part A Application portion of this permit document).
- V.C.1.b.** Burning, in the Multi-Purpose Rotary Kiln Unit, of the wastes not listed in this Permit is prohibited.
- V.C.1.c.** Prohibited wastes which are not to be burned in the Multi-Purpose Rotary Kiln Unit include as a minimum the following:
 - V.C.1.c.(1)** Dioxin-containing wastes, identified by EPA as F020, F021, F022, F023, F026, and F027 wastes in LAC 33:V.4901.B;
 - V.C.1.c.(2)** Polychlorinated biphenyl (PCB) waste 50 ppm or greater, as defined in 40 CFR Part 761.3;
 - V.C.1.c.(3)** Radioactive or nuclear waste material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV;

- V.C.1.c.(4) Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;
- V.C.1.c.(5) Containerized gases;
- V.C.1.c.(6) Municipal waste;
- V.C.1.c.(7) Infectious wastes/Medical wastes as defined in 40 CFR 60.51.c;
- V.C.1.c.(8) Metal bearing wastes listed in LAC 33:V. Chapter 22, Table 12, except as described in 2207.C;
- V.C.1.c.(9) Wastes displaying the Characteristic of Reactivity as defined in LAC 33:V.4903.D.3, 7 and 8;
- V.C.1.c.(10) Wastes from off-site CERCLA (Superfund) sites under remediation; or
- V.C.1.c.(11) any listed waste (listed in either LAC 33:V.Chapter 31, Table 1 or LAC 33:V.Chapter 49) in concentrations greater than 100 ppm with a heat of combustion less than that of carbon tetrachloride (0.24 calories/gram or 432 BTU/lb).

V.C.1.d. Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a modification to the permit as required under LAC 33:V.321.

V.C.2. Closure

The Permittee will close this facility according to LAC 33:V.3121 and the Closure Plan referenced in Attachment 1.

V.D. RISK-BASED CONDITIONS (RESERVED)

VI. GROUND WATER PROTECTION

VI.A. APPLICABILITY

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 25, 27, 29, 30, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Act, R.S. 30:2001 et seq., and the provisions of this section shall apply to ground water protection programs for facilities that are used to treat, store and dispose hazardous wastes at Syngenta Crop Protection, Inc., St Gabriel, Louisiana. No active regulated units are identified in this permit which are, at the time of issuance of this Permit, subject to Ground Water monitoring.

VI.B. Permittee shall comply with the monitoring, response and corrective action program provisions for the existing and any new systems in accordance with LAC 33:V. Chapter 33 and as outlined in this permit (i.e., Section VII, HSWA).

VI.C. If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the permittee shall establish, expand or continue, assessment and corrective action programs in accordance with the requirements of LAC 33:V. Chapter 33 and as subsequently directed by the Administrative Authority.

HSWA/CAS

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4141.D and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed for potential modification, suspension, or termination upon the Administrative Authority's initiative in accordance with LAC 33:V.323.A. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the Waste Analysis Plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the Permit, including information submittals, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the Corrective Action Strategy must conform to those requirements outlined in the Risk Evaluation Corrective Action Program (RECAP; see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP shall be requested by the Permittee prior to submittal to the Administrative Authority, as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality
Office of Environmental Assessment
Environmental Technology Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

A summary of the planned reporting milestones pursuant to the corrective action requirements of this Permit is found in Condition VIII, Table 1.

VII.A.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken

pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

VII.A.10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana Legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

VII.B EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB AIR REGULATIONS)

VII.B.1. PERFORMANCE STANDARDS FOR EQUIPMENT LEAKS

VII.B.1.a. Operating Requirements

The Permittee shall comply with the applicable requirements under LAC 33:V. Chapter 17 Subchapter B – Equipment Leaks – for all equipment associated with operations that treat, store, or dispose of hazardous waste with organic concentrations of at least 10 percent by weight in accordance with LAC 33:V.1717.B. Exclusions may apply if the equipment meets the requirements of LAC 33:V.1717.F

VII.B.1.b. Monitoring Requirements

The Permittee shall monitor the following equipment for proper operation: pumps in light service, LAC 33:V.1719.A; compressors, LAC 33:V.1721; pressure relief devices in gas/vapor service, LAC 33:V.1723; open-ended valves or lines, LAC 33:1727; valves in gas/vapor service or in light liquid service, LAC 33:V.1737; and pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors, LAC 33:V.1731.

VII.B.1.d. Reporting Requirements

A semiannual report shall be submitted to the Administrative Authority in accordance with the requirements of LAC 33:V.1745, based on the date of submittal of the annual report for the facility. A report is not required for a 6-month period during which all pumps in light service, compressors, pressure relief devices in gas/vapor service, open-ended valves or lines, valves in gas/vapor service or in light liquid service, pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors are operated such that during no period of twenty four (24) hours or longer did the devices operate continuously in noncompliance with the applicable operating conditions defined in LAC 33:V.Chapter 17.Subchapter B.

VII.B.2. STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS

VII.B.2.a. Operating Requirements

VII.B.2.a(1) The Permittee shall comply with the applicable requirements of LAC 33:V. Chapter 17, Subchapter C.

VII.B.2.a(2) The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information, and reports as contained in the Part B Permit Application.

VII.B.2.a(3) The Permittee shall, upon request, identify all less than 90-day accumulation tanks or containers, which contain or contact hazardous wastes with organic concentrations equal to or greater than 10 parts per million by weight (ppmw) and identify the emission control system requirements under LAC 33:V.1703 to 1715.

VII.B.2.b. Monitoring Requirements

VII.B.2.b(1) The pollution control methods used for tanks shall be inspected on a periodic basis.

VII.B.2.b(2) Tanks meeting Level 1 controls shall be inspected at least once every year, LAC 33:V.1755.C.4.

VII.B.2.b(3) Tanks meeting Level 2 controls shall be inspected in accordance with LAC 1755.E.3 for internal floating roofs, LAC 33:V.1755.F.3 for external floating roofs, LAC 33:V.1755.G.3 for air emission control equipment, and LAC 33:V.1755.I.4 for closed vent control systems.

VII.B.2.b(4) The pollution control methods used for containers shall be inspected on a periodic basis.

VII.B.2.b(5) Level 1 controls for containers shall be inspected in accordance with LAC 33:V.1759.C.4.

VII.B.2.b(6) Level 2 controls for containers shall be inspected in accordance with LAC 33:V.1759.D.4.

VII.B.2.b(7) Level 3 controls for containers shall be inspected in accordance with LAC 33:V.1759.E.4.

VII.B.2.c. Recordkeeping Requirements

Air emission control design documentation shall be maintained in the facility operating record until the equipment is no longer in service. Records must be prepared and maintained for the various equipment and systems used at the facility.

VII.B.2.c(1) Tanks using air emission control records must meet LAC 33:V.1765.B requirements.

VII.B.2.c(2) Container storage areas using Level 3 controls must meet LAC 33:V.1765.D requirements.

VII.B.2.c(3) Closed-vent system and control device systems meeting LAC 33:V.1761 must meet LAC 33:V.1765.E requirements.

VII.B.2.c(4) Facilities exempted by LAC 33:V.1751.C must meet LAC 33:V.1765.F requirements.

VII.B.2.c(5) Components identified as "unsafe to inspect and monitor" in accordance with LAC 33:V.1755.L and 1757.G must meet LAC 33:V.1765.G requirements.

VII.B.2.c(6) Facilities that are governed by this Chapter and use alternate control systems meeting the emission control standards of 40 CFR 60, Subpart VV or 40 CFR 61, Subpart V must meet LAC 33:V.1765.H requirements.

VII.B.2.c(7) All tanks or containers not using air emission controls in accordance with LAC 33:V.1747.D must meet LAC 33:V.1765.I requirements.

VII.B.2.d. Reporting Requirements

VII.B.2.d(1) For each tank, surface impoundment, or container which manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Administrative Authority within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the conditions of LAC 33:V.1751.C, as applicable. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.

VII.B.2.d(2) For control devices used in accordance with the requirements of LAC 33:V.1735, a semiannual written report shall be submitted to the Administrative Authority, based on the date of submittal of the annual report, except as provided for in noncompliance situations. The report shall describe each occurrence during the previous six (6)-month period when a control device is operated continuously for twenty-four (24) hours or longer in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or when a flare is operated with visible emissions as defined in LAC 33:V.1707.D. The written report shall include the EPA identification number, facility name and address, an explanation why the control device could not be returned to compliance within 24 hours, and actions taken to correct the noncompliance.

VII.B.2.d(3) The report to the Administrative Authority in accordance with the requirements of VII.B.2.d.1. above is not required for a six (6)-month period during which all control devices subject to LAC 33:V, Subchapter C are operated such that during no period of twenty-four (24) hour or longer did control devices operate continuously in noncompliance with the applicable operating values defined in LAC 33:V.1713.C.4 or a flare operate with visible emissions as defined in LAC 33:V.1707.D.

VII.B.2.d(4) All reports shall be signed and dated by an authorized representative of the Permittee as per LAC 33:V.507.

**TABLE VII.B.1
EMISSION CONTROLS FOR TANKS**

Tank	Service	LAC Reference(s)	Air Emission Controls
4402-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FA	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FB	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FC	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FD	Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FE	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4403-FG	Organic/Aqueous Waste	LAC 33:V.1755.D.3	Level 2 Controls
4404-F	Organic Waste	LAC 33:V.1755.D.3	Level 2 Controls
4604-F1	Bulk (solid/sludge)	LAC 33:V.1755.D.3	Level 2 Controls
4609-F	Sludge Waste	LAC 33:V.1755.D.3	Level 2 Controls
4619-F	Hydro-Recirculation	LAC 33:V.1755.D.3	Level 2 Controls
4620-F	Entrainment Separator/Flue Gas Residuals	LAC 33:V.1755.D.3	Level 2 Controls

**TABLE VII.B.2
EMISSION CONTROLS FOR CONTAINERS/CONTAINER STORAGE AREAS**

Container/Container Storage Area Identification	LAC Reference(s)	Air Emission Controls
Covered Warehouse	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Truck Unloading Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls
Incinerator Ash Area	LAC 3:V.1759.C.1.a and F.1 through .4	Level 1 Controls

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority of any commencement of partial and final closure activities in accordance with LAC 33:V.3511.D.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

VIII.A. ALTERNATE CORRECTIVE ACTION

VIII.A.1. Introduction to the CAS

This Permit will utilize the CAS Guidance Document (http://www.epa.gov/region6/6pd/rcra_c/pd-o/cas_final08.pdf) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and

implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFI, CMS, CMI, etc.) are not elements of the CAS. However, in addition to new site-specific information, the use of information and reports from the traditional corrective action process, if available, is encouraged.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A. 2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current

and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

VIII.A.3.a. Use of the Screening Option - The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Use of Management Option 1 - The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Use of Management Option 2 – The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Use of Management Option 3 – The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary: Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility: Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

VIII.A.6. Summary of Corrective Action Activities: A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Condition VIII, Appendix 1, Table 2 of this permit.

VIII.A.7 Approval of Alternate Schedule: The Permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Condition VIII, Table 1. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS within sixty (60) days of the effective date of this permit. The notice of intent should state the following in a concise manner:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the Permittee will proceed through the CAS;

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:I.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the “base document” to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a(1) General geographic location;

VIII.D.1.a(2) Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a(3) Facility structures, process areas and maintenance areas;

VIII.D.1.a(4) Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a(5) Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The Permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a(1) Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a(2) Locations of sensitive subpopulations; and

VIII.D.2.a(3) An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of RECAP.

VIII.D.3. Physical Profile

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a(1) Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a(2) Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a(3) Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a (4) Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a(5) Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a(6) Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a(1) Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a(2) Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a(3) Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a(4) Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim Measures Workplan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.5. Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.6. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

VIII.F.1.a. The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c(1) Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c(2) Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

VIII.F.1.c(3) Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c(4) Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c(5) Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c(6) 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c(7) RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c(8) Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c(9) The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems," prepared by the LDEQ and the Louisiana Department of Transportation and Development.** This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c(10) The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

VIII.G.1. The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

VIII.H.1. The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Workplan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The Permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.d. An assessment of the costs of implementation for potential remedies;

VIII.I.5.e. An assessment of the time required to begin and complete the remedy;

VIII.I.5.f. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.g. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT DETERMINATIONS FOR SPECIFIC SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification (¹ requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1¹ permit modification (1¹ requiring Administrative Authority approval) request.

VIII.K.2. FACILITY-WIDE NFA-ATT DETERMINATION

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a sixty (60)-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the sixty (60)-day comment period.

VIII.K.2.g. If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. CONTINUED MONITORING

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. ADDITIONAL INVESTIGATIONS

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1¹ permit modification request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such

investigations. The plan for investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1¹ permit modification procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated

plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification request under LAC 33:V.321.C.1. The Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1¹ permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

VIII.N.2. Draft Permitting Decision

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

VIII.N.3. Final Remedy Selection

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.N.4. Facility-Wide NFA-ATT

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the Permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

Table 1: Corrective Action Strategy Notification and Reporting Requirements

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the Permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process.

Actions	Due Date
Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	Within sixty (60) days of the effective date of this permit (if facility corrective action is required)
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within sixty (60) days of submittal of the Notice of Intent
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case-by-case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority	Within one-hundred and twenty (120) days after the scoping meeting
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Workplan for the facility investigation to the Administrative Authority (Condition VIII.F)	Within one-hundred and eighty (180) days after the CAS Scoping Meeting

Implement site investigation activities under CAS Investigation Workplan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submittal of Remedial Alternatives Study (RAS) to the Administrative Authority (Condition VIII.I)	Within ninety (90) days of completion of approval of the RECAP Report by the Administrative Authority
Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)	Within sixty (90) days of approval of the RAS by the Administrative Authority
Submit NFA (and Permit Modification) request to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) days after discovery
Notification of newly-discovered releases (Condition VIII.M)	Fifteen (15) days after discovery

APPENDIX 1

SUMMARY OF CORRECTIVE ACTION ACTIVITIES

Sixty one (61) SWMUs were identified by an EPA contractor during a RCRA Facility Assessment (RFA) in January 1987. Of these, eleven (11) SWMUs were listed in the permit requiring further study and subject to an RFI. In addition to the eleven (11) SWMUs, seven (7) additional areas were identified either as Areas of Concern or potential SWMUs. EPA required on September 28, 1990, that these SWMUs as well as the areas of concern be investigated for potential releases of contamination.

Notification of the actions taken to investigate the seven additional areas of contamination, summary of findings and planned corrective actions to remediate these locations were provided to LDEQ and EPA, Region VI on January 9, 1990 and March 6, 1990. At the request of EPA (September 28, 1990), the additional seven areas were included in the RFI.

The work plans were submitted and approved by the EPA in January, 1991. The RFI work plan was divided and implemented in three phases.

Phase I (11) SWMUs

- **Sandbed Filter Ponds 1 and 2**
- **East Pond**
- **NPDES Equalization Pond**
- **Old Hazardous Waste Pipeline**
 - Location No.1, Block F-4**
 - Location No. 3, Block F-4**
- **Process Block F-5, Location AW-1**
- **Spoil Piles 1 and 2**
- **Process Block G-7, Location No.7**
- **Background**

Phase II (3) SWMUs

- **Old Hazardous Waste Pipeline, Locations 5, and 6,**
- **Process Block E-4, Location 4**

Phase III (4) SWMUs

- **Waste Oil Recovery Tanks**
- **Waste Oil Storage Area**
- **Pilot Plant Drum Rinsing Area**
- **Old Acid Storage Tank Area**

TABLE 2. SUMMARY OF CORRECTIVE ACTION ACTIVITIES*

<i>AOC or SWMU Number/Area Name</i>	<i>AOC/SWMU Description</i>	<i>Status of CA Activity</i>	<i>Corrective Action</i>	<i>EDMS² Document ID #/ Approval Date</i>
Acid Storage Tank Number 2404	Groundwater	Syngenta submitted final report and requested NFA. Waiting on LDEQ approval		Vol 1 37183218, Vol 2 37212979, Vol 3 37212981 /July 21, 2008
Environmental Operations Extended Area	Soil	Syngenta submitted final report and requested NFA. Waiting on LDEQ approval		July 31, 2008
Pilot Plant Drum Rinsing Area	Soil	Syngenta submitted final report and requested NFA. Waiting on LDEQ approval		July 31, 2008
East Pond	Soil	LDEQ approved closure plan modification request	Currently Closing under solid waste permit GD-047- 0024/P-0017	34585548/ September 5, 2006
Spoils Pile 1 & 2	Soil	LDEQ approved closure plan modification	Currently Closing under solid waste	34585548/ September 5, 2006

<i>AOC or SWMU Number/Area Name</i>	<i>AOC/SWMU Description</i>	<i>Status of CA Activity</i>	<i>Corrective Action</i>	<i>EDMS² Document ID #/ Approval Date</i>
		request	permit GD-047-0024/P-0017	

Table 3. AOC/SWMU Which No longer Require Corrective Action

<i>SWMU Name</i>	<i>Activity Type</i>	<i>Approval Date</i>	<i>EDMS² Document ID #/</i>	<i>Institutional Controls</i>
Old Hazardous Waste Pipeline, Location 1 Block F-4	No Further Action	October 21, 1997	8077214	None Required
Old Hazardous Waste Pipeline, Location 3 Block F-4	No Further Action	October 21, 1997	8077214	None Required
Process Block F-5 Location A W-1	No Further Action	October 21, 1997	8077214	None required
Process Block G-7 Location 7 NFARAT	No Further Action	October 21, 1997	8077214	None Required
Old Hazardous Waste Pipeline Location 5	No Further Action	August 4, 1997	8086699	None required
Old Hazardous Waste Pipeline Location 6	No Further Action	August 4, 1997	8086699	None Required
Background-Phase 1 report	No Further Action	October 21, 1997	8077214	None Required
Old Hazardous Waste Pipeline Location 4	No Further Action	October 11, 2006	34744635	Conveyance Notice Filed
Waste Oil Recovery Tanks	No Further Action	December 1, 2006	35524490	None Required
Waste Oil Storage Area	No Further Action	December 1, 2006	35524490	None Required

Old Acid Tank Storage Area	No Further Action	December 1, 2006	35524490	None Required
Sandbed Filters 1 & 2 Block G-6	Released from Post-Closure	July 2, 2008	37066831	Conveyance Notice Filed
Equalization Pond Block F-7	Released from Post-Closure and Discontinued Groundwater Monitoring	August 22, 2007	36205564	Conveyance Notice Filed
Galecron Loading Area	No Further Action	April 27, 2005	32842113	Conveyance Notice Filed
Isopropylamine Storage Tank 911 Area	No Further Action	February 2, 2006	33920704	Conveyance Noticed Filed
Block D-7 Caustic Releases and Acidic Soil Conditions	No Further Action	April 27, 2005	32842113	Conveyance Notice Filed
Liquid Incinerator Closure Area	Clean Closure Certification/Verification	September 25, 2007	36297086	None Required
Sutan Remediation Area	No Further Action	December 7, 2007	36459262	None Required
Lumax Spill Area	No Further Action	December 7, 2007	36459262	Conveyance Notice Filed
Former Tank 112-F Area Remediation	No Further Action	January 16, 2008	36553589	Conveyance Notice Filed
Inteon Construction Area	No Further Action	June 6, 2008	37034677	None Required
Trailer Parking Extended Area	No Further Action	June 6, 2008	37034679	None Required

RESPONSIVENESS SUMMARY

**SYNGENTA CROP PROTECTION, INC.,
LAD053783445/PERMIT NUMBER LAD053783445-OP-RN-1-MO-1
CLASS 3 DRAFT HAZARDOUS WASTE MODIFIED OPERATING PERMIT
AGENCY INTEREST #2367**

THE LDEQ DID NOT RECEIVE ANY WRITTEN COMMENTS DURING THE PUBLIC
NOTICE/COMMENT PERIOD OF AUGUST 21, 2008 TO OCTOBER 13, 2008.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LAD053783445-RN-OP-1
AI#2367

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	EDMS DOCUMENT ID#/TEMPO ACTIVITY#	COMMENTS
Arrangement with local authorities	5/1/2002	23493420	This information is included in Section 6 and Section 15 in the revised stand alone Contingency Plan of the referenced EDMS document.
Closure cost estimates	4/1/2001	18076633 PER19990003	This plan is identified as Appendix A, Attachment 5, Volume IV, to the 4/1/2001 application document.
Closure Plan	4/1/2001	18076633 PER19990003	This plan is identified as Appendix A, Attachment 5, Volume IV, to the 4/1/2001 application document.
Contingency Plan	5/1/2002	23493420	This is a revised stand alone Contingency Plan.
Inspection Plan	4/1/2001	18071823 PER19990003	This plan is identified as Appendix A, Attachment 2, Volume III, of the 4/1/2001 application document.
Security Plan	To be inserted after document review and approval by LDEQ	To be inserted after document review and approval by LDEQ	A revised security plan is to be submitted by the permittee pursuant to the Schedule of Compliance and, upon review and approval by the administrative authority included herein by reference.
Personnel Training Plan	4/1/2001	18077696 PER19990003	This plan is identified as Appendix A, Attachment 4, Volume IV, to the 4/1/2001 application document.
Waste Analysis Plan	4/1/2001	18071823 PER19990003	This plan is identified as Appendix A, Attachment 1, Volume III, to the 4/1/2001 application document.